

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest No. 87883
Activity No.: PER20080003

Mr. Ed Ivey
Plant Manager
Hexion Specialty Chemicals, Inc.
16122 River Road
Norco, LA 70079

RE: Part 70 Operating Permit Renewal; Norco Facility, C-Unit, CaCl₂ Unit, and ECH Finishing System;
Hexion Speciality Chemicals, Inc.; Norco; St. Charles Parish; Louisiana

Dear Mr. Ivey:

This is to inform you that the permit renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Permit No.: 2869-V3

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

CSN/CMM
cc: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY**

**AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA**

I. Background

Hexion Specialty Chemicals, Inc. (HSC) operates the Crude Epichlorohydrin Unit (C-Unit), the Calcium Chloride (CaCl₂) Unit, and ECH Finishing System under Part 70 Permit No. 2869-V2 dated April 3, 2006. These units were previously owned and operated by Shell Chemical LP.

II. Origin

Hexion Specialty Chemicals submitted an application and Emission Inventory Questionnaire (EIQ) dated September 18, 2008, requesting a Part 70 permit renewal for the C-Unit, CaCl₂ Unit, and ECH Finishing System. Additional information dated April 14, 2010, was also received.

III. Description

The Hexion Specialty Chemical, Norco Facility consists of several units that operate under existing permits. This permit addresses the Crude Epichlorohydrin Unit (C-Unit), Calcium Chloride (CaCl₂) Unit, and ECH Finishing System. Additionally, this permit includes the Chlorine Adsorption System and Hydrogen Chloride loading operations.

C-Unit:

The C-Unit produces Allyl Chloride, Crude Epichlorohydrin (ECH), and approximately 36.5% Hydrochloric Acid solution. The primary raw materials used in the C-unit are propylene, chlorine and lime. Propylene is reacted with chlorine to form allyl chloride. The allyl chloride water and chlorine are fed to several recirculation loop reactors, where an aqueous dichlorohydrin solution is formed. The dichlorohydrin stream is then routed to the ECH Stripper Column where it is contacted with lime producing crude ECH.

CaCl₂ Unit:

The CaCl₂ Unit produces calcium chloride slurry by reacting HCl solution produced in the C-Unit with limestone. The resulting CaCl₂ solution is sold as product. This unit was upgraded under Permit No.2869-V1 dated May 20, 2005.

ECH Finishing System:

The ECH Finishing System then distills crude ECH into finished ECH through the light ends and heavy ends removal columns.

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Hexion proposes to renew the Part 70 permit and reconcile the requirement section with updated requirements. Also, the Propylene Oxide Charging Operations, Emission Point No. 216, is being deleted. This activity is no longer performed at the facility. No physical modifications or changes in operation are being proposed at this time.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	23.80	23.81	+0.01
SO ₂	0.03	0.03	-
NO _x	4.09	4.09	-
CO	3.44	3.44	-
VOC*	121.40	121.34	-0.06

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs) in TPY:**

Pollutant	Before	After	Change
1,2-Dichloropropane	0.44	0.37	-0.07
1,3-Dichloropropene	0.66	0.66	-
Acrolein	0.53	0.533	+0.003
Allyl chloride	13.28	13.296	+0.016
Benzene	0.004	0.004	-
Epichlorohydrin	29.94	29.94	-
Ethyl benzene	0.01	<0.001	-0.01
Propylene oxide	0.07	-	-0.07
Toluene	1.71	1.712	+0.002
Xylenes	0.01	0.001	-0.009
n-Hexane	0.002	0.002	-
Total TAPs	46.656	46.518	-0.138
Other VOC	74.744	74.822	+0.078

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NON-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Chlorine	2.96	2.97	+0.01
Hydrochloric acid	6.14	6.133	-0.007
Total Non-VOC TAPs	9.10	9.103	+0.003

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and NESHAP. Prevention of Significant Deterioration does not apply.

This facility is part of a major source of toxic air pollutants. Louisiana Department of Environmental Quality, Environmental Services approved the utilization of the Louisiana Consolidated Fugitive Emissions Program on November 7, 2001. The Air Toxic Compliance Plan was approved on January 8, 1996 under the Shell Chemical Company's name.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

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VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on XXXXX, and in *St. Charles Herald-Guide*, Boutte, on XXXXX, and submitted to the St. Charles Parish Library on XXXXX. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on XXXX. All comments will be considered prior to a final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: N/A

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)

VIII. General Condition XVII Activities

General Condition XVII Activities emissions are as follows:

Activity ID No.	Activity	Frequency of Activity
GC-1	Closed Loop Samples	500/month
GC-2	Open Line Sampling	250/month
GC-3	Routine Tank Inspections	Once 1-10 years
GC-4	Tank Sludge Removal	Once 1-10 years
GC-5	Nitrogen Clearing	6 times/yr
GC-6	Instrument Maintenance	17 times/yr
GC-7	Miscellaneous Equipment Preparation	15 times/yr
GC-8	Equipment Cleaning	15 times/yr

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Activity	Total Annual Emissions (TPY)					
	PM ₁₀	SO ₂	NO _x	CO	VOC	Other
GC-1	-	-	-	-	0.11	-
GC-2	-	-	-	-	0.08	-
GC-3	-	-	-	-	4.02	-
GC-4	-	-	-	-	4.10	-
GC-5	-	-	-	-	0.09	-
GC-6	-	-	-	-	<0.01	-
GC-7	-	-	-	-	0.28	-
GC-8	-	-	-	-	0.28	-

IX. Insignificant Activities

ID No.:	Description	Max Rate or Tank Capacity	Citation
T-AN101C	Lube Oil Tank	750 gal.	LAC 33:III.501.B.5.A.3
T-C101	Lube Oil Tank	1,060 gal.	LAC 33:III.501.B.5.A.3
T-C202	Lube Oil Tank	1,037 gal.	LAC 33:III.501.B.5.A.3
T-C825	Lube Oil Tank	2,100 gal.	LAC 33:III.501.B.5.A.3
V-C236	Lube Oil Tank	1,430 gal.	LAC 33:III.501.B.5.A.3
T-6003A-D	CaCl ₂ Brine Tank	350,000 gal.	LAC 33:III.501.B.5.A.4
T-C701	Sodium Hypochlorite Tank	1,500 gal.	LAC 33:III.501.B.5.A.4
T-C702	Water Treatment Chemical Tank	1,100 gal.	LAC 33:III.501.B.5.A.4
T-C703	Water Treatment Chemical Tank	1,602 gal.	LAC 33:III.501.B.5.A.4
T-VC902C	Sodium Hypochlorite Tank	40,000 gal.	LAC 33:III.501.B.5.A.4
T-VC903C	20% NaOH/NaOCl Tank	N/A	LAC 33:III.501.B.5.A.4

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ID No.:	Description	Max Rate or Tank Capacity	Citation
T-VC904C	20% NaOH/NaOCl Tank	N/A	LAC 33:III.501.B.5.A.4
--	Dispersant Tank, Lab Vents, Analyzers, Detergent Tanks	--	LAC 33:III.501.B.5.A.4, 6, 7, and 9
N84051	Aqueous Polymer Tank	1,000 gal.	LAC 33:III.501.B.5.A.3
T-VC905C	Sodium Hypochlorite Tank	111,000 gal.	LAC 33:III.501.B.5.A.4
--	Drum Washing Activities	--	LAC 33:III.501.B.5.A.7
--	Detergent Tanks	--	LAC 33:III.501.B.5.A.10
--	Portable Surfactant Tank	--	LAC 33:III.501.B.5.A.10

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X. **Table 1: Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	LAC 33:III.Chapter																	
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56
UNF 3	C-Unit, CaCl Unit, and ECH Finishing Unit	1	1	1							1					1	1	1	1
ARE 1	112 Limestone Storage and Handling																		
EQT 5	101 Propylene Preheater (F-C201)													2					
EQT 6	102 ECH Stripper Bottoms Hydrolysis Tank															1			
EQT 7	103 37% HCl Vent Scrubber (C-C910)															1			
EQT 8	104-A Cl Absorber Vents (C-VC901C)																		
EQT 9	104-B Cl Absorber (C-VC902C)																		
EQT 10	105 Isopropanol Tank (T-STR253)												1						
EQT 11	109 Cooling Tower (CWT-12)												3						
EQT 12	111 CaCl Dissolver Vent Scrubber (C-C803)														2		1		
EQT 14	191 HCl Storage Tank (T-U551)																1		

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		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56	59*
EQT 15	192 HCl Storage Tank (T-U552)																			1
EQT 16	193 ECH Stripper Bottoms Equalization Tank (T-T102)																			1
EQT 17	201 Lime Silo (V-C801)																			
EQT 18	202 Lime Silo (V-C803)																			
EQT 19	210 ECH Surge Pot Vent (V-C401)																			1
EQT 20	211 Isopropanol Storage Tank (T-SA102)																			
EQT 23	229-A HCl Tank Truck Loading Scrubber (C-C911)																			1
EQT 24	229-B HCl Tank Car Loading Scrubber (C-C980)																			1
EQT 25	C-C201 Prefractionator Column																			3
EQT 26	C-C202 HCl Absorber																			
EQT 27	C-C203 HCl Absorber																			
EQT 28	C-C205 Caustic Scrubber																			

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM NOBCO EACH UNIT

NURCO FACILITY

AGENCY INTEREST NO.: 87883

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HEXAGON SPECIALITY CHEMICALS, INC.
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X. **Table 1: Applicable Louisiana and Federal Air Quality Requirements**

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM****NORCO FACILITY****AGENCY INTEREST NO.: 87883****HEXION SPECIALTY CHEMICALS, INC.****NORCO, ST. CHARLES PARISH, LOUISIANA****X. Table 1: Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	LAC 33:III.Chapter																		
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56	59*
EQT 41	LRTC#5 Low Residence Time Chlorhydrinator																			
EQT 42	MLW-6 Marine ECH Loading																			
EQT 43	T-B902 Crude ECH Tank																			
EQT 44	T-B904 Crude TCP Tank																			
EQT 45	T-B905 Finished ECH Tank																			
EQT 46	T-B906 Finished ECH Tank																			
EQT 47	T-C907 TCP Residue Tank																			
EQT 48	T-C931 Finished AC Tank																			
EQT 49	T-C940 Finished AC Tank																			
EQT 50	T-C941 Finished AC Tank																			
EQT 51	T-C980 HCl Tank																			
EQT 52	T-C991 AC Heavy Ends Tank																			

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ID No.:	Description	LAC 33:III.Chapter																	
		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56
EQT 53	T-C992 AC Heavy Ends Tank																		
EQT 54	T-C993 HCl Tank																		
EQT 55	T-C994 HCl Tank																		
EQT 56	T-C996 HCl Tank																		
EQT 57	TCW-12 AC Heavy Ends TC Loading															3			
EQT 58	TCW-8 Sales Grade AC TC Loading															3			
EQT 59	TCW-X Finished ECH TC Loading															3			
EQT 60	TTW-S Sales Grade AC TT Loading															3			
EQT 61	TTW-9 AC Heavy Ends TT Loading															3			
EQT 62	TTW-X Finished ECH TT Loading															3			
EQT 63	V-6004A Crude AC Sphere															1			
EQT 64	V-6004B Crude AC Sphere															1			

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		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56	59*
EQT 65	V-C207 AC Reactor																			
EQT 66	V-C208 AC Reactor																			3
EQT 67	V-C211 Chloride Knockout Drum																			3
EQT 68	V-C226 Raw Acid Skimmer																			
EQT 69	V-C412 Decontamination Vessel																			
EQT 70	V-C901 AC Pressure Vessel																			1
EQT 71	V-C902 AC Pressure Vessel																			1
EQT 72	V-C903 AC Pressure Vessel																			1
EQT 73	V-C905 AC Tank TC Purge Vessel																			1
EQT 74	V-C906 AC Tank TT Loading Vesse																			1
EQT 81	141 Cooling Tower No. 2																			3
EQT 82	233 Site Gasoline/Diesel Storage Tank																			1

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		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56
EQT 83	T-S971 ECH Decontamination Tank																		
EQT 84	T-C990 HCl Storage Tank																		
EQT 85	T-M943 Finished ECH Rundown Tank																		
EQT 86	T-M944 Finished ECH Rundown Tank																		
EQT 145	119 Vacuum Pump Water Collection Tank T-M701																		
FUG 1	110 C-Unit Area Fugitive Emissions																		
FUG 2	218 C-Unit Wastewater Fugitive Emissions																		
FUG 4	227 CaCl Unit Area Fugitive Emissions																		
FUG 5	228 CaCl Unit Wastewater Fugitive Emissions																		
FUG 6	231 37% HCl Area Fugitive Emissions																		
FUG 7	232 ECH Finishing Section Fugitive Emissions																		

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		5▲	9	11	13	15	2103	2107	2108	2111	2113	2115	2121	2147	22	29*	51*	52	56	59*
GRP 6	104 Cl Absorber Vents Caps	1																		
GRP 7	229 HCl Loading Scrubbers Cap	1																		

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements which apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Table 1: Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR			
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	5N	64	68	82	
UNF 3	C-Unit, CaCl Unit, and ECH Finishing Unit	1							1	1	1	1	1							3	1	1	
ARE 1	112 Limestone Storage and Handling																						
EQT 5	101 Propylene Preheater (F-C201)	3																					
EQT 6	102 ECH Stripper Bottoms Hydrolysis Tank		3																	1			
EQT 7	103 37% HCl Vent Scrubber (C-C910)																			1			
EQT 8	104-A Cl Absorber Vents (C-VC901C)																			3			
EQT 9	104-B Cl Absorber (C-VC902C)																			3			
EQT 10	105 Isopropanol Tank (T-ST253)																			3			
EQT 11	109 Cooling Tower (CWT-12)																			3			
EQT 12	111 CaCl Dissolver Vent Scrubber (C-C803)																						
EQT 14	191 HCl Storage Tank (T-U551)																			3			3

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		A	Dc	K _b	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	5N	64	68	82	
EQT 15	192 HCl Storage Tank (T-U552)																						
EQT 16	193 ECH Stripper Bottoms Equalization Tank (T-T102)																						3
EQT 17	201 Lime Silo (V-C801)																						
EQT 18	202 Lime Silo (V-C803)																						
EQT 19	210 ECH Surge Pot Vent (V-C401)																						
EQT 20	211 Isopropanol Storage Tank (T-SA102)																						
EQT 23	229-A HCl Tank Truck Loading Scrubber (C-C911)																						1
EQT 24	229-B HCl Tank Car Loading Scrubber (C-C980)																						1
EQT 25	C-C201 Prefractionator Column																						
EQT 26	C-C202 HCl Absorber																						3
EQT 27	C-C203 HCl Absorber																						3

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		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	SN	64	68	82				
EQT 28	C-C205 Caustic Scrubber																									
EQT 29	C-C208 HCl Stripper Column																									
EQT 30	C-C301 AC Light Ends Column								1																	
EQT 31	C-C302 AC Finishing Column								1																	
EQT 32	C-C305 AC Sales Grade Column								1																	
EQT 33	C-C401 ECH Stripper Column								1																	
EQT 34	C-C403 DCH Recovery Column								3																	
EQT 35	C-M610 ECH Light Ends Column								1																	
EQT 36	C-S101 ECH Heavy Ends Column								1																	
EQT 37	LRTC#1 Low Residence Time Chlorhydrinator								1																	
EQT 38	LRTC#2 Low Residence Time Chlorhydrinator								1																	

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NORCO FACILITYAGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA**X. Table 1: Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS					40 CFR 61					40 CFR 63 NESHAP					40 CFR					
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	5N	64	68	82
EQT 39	LRTC#3 Low Residence Time Chlorhydrinator											3										
EQT 40	LRTC#4 Low Residence Time Chlorhydrinator											3										
EQT 41	LRTC#5 Low Residence Time Chlorhydrinator											3										
EQT 42	MLW-6 Marine ECH Loading																		1	1		
EQT 43	T-B902 Crude ECH Tank											3							1	1		
EQT 44	T-B904 Crude TCP Tank											3							1	1		
EQT 45	T-B905 Finished ECH Tank											3							1	1		
EQT 46	T-B906 Finished ECH Tank											3							1	1		
EQT 47	T-C907 TCP Residue Tank											3							1	1		
EQT 48	T-C931 Finished AC Tank											3							1	1		
EQT 49	T-C940 Finished AC Tank											3							1	1		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM**NORCO FACILITY****AGENCY INTEREST NO.: 87883****HEXION SPECIALTY CHEMICALS, INC.****NORCO, ST. CHARLES PARISH, LOUISIANA****X. Table 1: Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	42	5N	64	68	82				
EQT 50	T-C941 Finished AC Tank																									
EQT 51	T-C980 HCl Tank																									
EQT 52	T-C991 AC Heavy Ends Tank																									
EQT 53	T-C992 AC Heavy Ends Tank																									
EQT 54	T-C993 HCl Tank																									
EQT 55	T-C994 HCl Tank																									
EQT 56	T-C996 HCl Tank																									
EQT 57	TCW-12 AC Heavy Ends TC Loading																									
EQT 58	TCW-8 Sales Grade AC TC Loading																									
EQT 59	TCW-X Finished ECH TC Loading																									
EQT 60	TTW-5 Sales Grade AC TT Loading																									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM****NORCO FACILITY****AGENCY INTEREST NO.: 87883****HEXION SPECIALTY CHEMICALS, INC.****NORCO, ST. CHARLES PARISH, LOUISIANA****X. Table 1: Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR			
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	SN	64	68	82	
EQT 61	TTW-9 AC Heavy Ends TT Loading																			1			
EQT 62	TTW-X Finished ECH TT Loading																			1			
EQT 63	V-6004A Crude AC Sphere	3																		1			
EQT 64	V-6004B Crude AC Sphere	3																		1			
EQT 65	V-C207 AC Reactor								3														
EQT 66	V-C208 AC Reactor								3														
EQT 67	V-C211 Chloride Knockout Drum																		3		3		
EQT 68	V-C226 Raw Acid Skimmer																			3			
EQT 69	V-C412 Decontamination Vessel	3																	1				
EQT 70	V-C901 AC Pressure Vessel	3																	1				
EQT 71	V-C902 AC Pressure Vessel	3																	1				

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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AGENCY INTEREST NO.: 87883
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X. Table 1: Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	5N	64	68	82				
EQT 72	V-C903 AC Pressure Vessel																									
EQT 73	V-C905 AC Tank TC Purge Vessel																									
EQT 74	V-C906 AC Tank TT Loading Vessel																									
EQT 81	I41 Cooling Tower No. 2																									
EQT 82	233 Site Gasoline/Diesel Storage Tank																									
EQT 83	T-S971 ECH Decontamination Tank																									
EQT 84	T-C990 HCl Storage Tank																									
EQT 85	T-M943 Finished ECH Rundown Tank																									
EQT 86	T-M944 Finished ECH Rundown Tank																									
EQT 145	119 Vacuum Pump Water Collection Tank T-M701																									
FUG 1	110 C-Unit Area Fugitive Emissions																									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
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AGENCY INTEREST NO.: 87883
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X. Table 1: Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR			
		A	Dc	Kb	VV	3N	3R	4I	A	M	V	FF	A	F	G	H	Q	4Z	SN	64	68	82	
FUG 2	218 C-Unit Wastewater Fugitive Emissions																						
FUG 4	227 CaCl Unit Area Fugitive Emissions																						
FUG 5	228 CaCl Unit Wastewater Fugitive Emissions																						
FUG 6	231 37% HCl Area Fugitive Emissions																						
FUG 7	232 ECH Finishing Section Fugitive Emissions																						
GRP 6	104 Cl Absorber Vent Cap																						
GRP 7	229 HCl Loading Scrubbers Cap																						

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM

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AGENCY INTEREST NO.: 87883

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NORCO, ST. CHARLES PARISH, LOUISIANA

KEY TO MATRIX

- 1 -The regulations have applicable requirements which apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements which apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criteria, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
UNF 3 C-Unit, CACl ₂ , ECH Finishing	40 CFR 64 Compliance Assurance Monitoring	Unit does not have a pollutant-specific emissions unit with active controls.	
EQT 5 101 – Propylene Preheater	40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units LAC 33:III:2115 Control of Emission of Organic Compounds – Waste Gas Disposal	DOES NOT APPLY Does not meet the definition of a steam generating unit. EXEMPT	As per LAC 33:III:2115.H.1.c
EQT 6 102 – ECH Stripper Bottoms Hydrolysis Tank	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 LAC 33:III:2103 Storage of Volatile Organic Compounds	DOES NOT APPLY Constructed prior to July 23, 1984. Not modified or reconstructed since. DOES NOT APPLY The maximum true vapor pressure of the stored contents at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.
EQT 7 103 – 37% HCl Bent Scrubber	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a process vent as per 40 CFR 63.107.	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
 NORCO FACILITY
 AGENCY INTEREST NO.: 87883
 HEXION SPECIALTY CHEMICALS, INC.
 NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 8 and 9 104-A and 104-B Cl Absorber Vents	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a process vent as per 40 CFR 63.107.	
EQT 10 105 – Isopropanol Tank	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOC Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY. Storage capacity less than 75 m ³ (19,813 gallons).	Tank capacity is 3,700 gallons.
	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a HON storage vessel as per 40 CFR 63.101.	
EQT 11 109 – Cooling Towers	40 CFR 63.400 NESHAP Subpart Q, National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	DOES NOT APPLY Chromium-based water treatment chemicals are not utilized.	Has not operated with chromium based water treatment chemicals since September 8, 1984.
	LAC 33:III.1311 Emission Standards for Particulate Matter (Including Standards fro Some Specific Facilities) – Emission Limits	DOES NOT APPLY. Uncombined water is present. LAC 33:III.1311.F	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

X1. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 12 111 - CaCl Dissolver Vent Scrubber	LAC 33:II.2115 Control of Emission of Organic Compounds – Waste Gas Disposal	EXEMPT Waste gas stream containing VOC is exempt from the control requirements of Section 2115, a waste gas stream with a concentration of VOC's less than 0.44 psia true partial pressure (30,000 ppm).	As per LAC 33:II.2115.H.1d
EQT 14 and 15 191 and 192	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a HON storage vessel as per 40 CFR 63.101.	
	40 CFR 63.8595 NESHAP Subpart NNNNN — National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production	DOES NOT APPLY Concentration less than 30% wt. 40 CFR 63.9000C(1)	
EQT 16 193 - ECH Stripper Bottoms' Tank	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY. Constructed prior to July 23, 1984. Not modified or reconstructed since.	
	LAC 33:II.2103 Storage of Volatile Organic Compounds	DOES NOT APPLY The maximum true vapor pressure of the stored contents at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 19 210 - ECH Surge Pot Vent	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a process vent as per 40 CFR 63.107.	
40 CFR 63.160	NESHAP Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	DOES NOT APPLY Does not meet capacity requirements specified in Table 2.	
LAC 33:II 2115 Control of Emission of Organic Compounds – Waste Gas Disposal	EXEMPT	Waste gas stream containing VOC is exempt from the control requirements of Section 2115, as the emission of the waste gas stream is equal to or less than 100 lbs of VOC/24-hr. period.	As per LAC 33:III 2115.H.1.c
EQT 20 211 - Isopropanol Storage Tank	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOC Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY Constructed prior to July 23, 1984. Not modified or reconstructed since.	
40 CFR 63.100	NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a HON storage vessel as per 40 CFR 63.101.	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 20 211 - Isopropanol Storage Tank (Continued)	LAC 33:III.2103 Storage of Volatile Organic Compounds	DOES NOT APPLY The maximum true vapor pressure of the stored contents, at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.
EQT 23 and 24 229-A and 229-B HCL Tank Truck/Car Load Scrubber	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a transfer operation as per 40 CFR 63.101.	
EQT 26, 27, and 28 C-C202, C-C203, and C-C205	40 CFR 63.8595 NESHAP Subpart NNNNN — National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production	DOES NOT APPLY Does not meet the definition of HCl process vents. Vents backs to process. No emissions to atmosphere.	
EQT 29 C-C208 - HCl Stripper Column	40 CFR 63.8595 NESHAP Subpart NNNNN — National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production	DOES NOT APPLY Does not meet the definition of an HCl process vent.	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 25, 30 thru 36, 65, and 66 C201, C301, C302, C305, C401, C403, CM610, and CS101 -Columns	LAC 33:III.2147 Limiting VOC Emissions from SOCMI Reactor Processes and Distillation Operations	DOES NOT APPLY Source is not located within the affected parishes.	
EQT 34 C-C403 Column	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Column overhead liquid stream routed back to the process. Downstream emissions routed to a control device, Organic Chloride Incinerators, Emission Point Nos. 173 and 174. 40 CFR 63.107(g)	
EQT 37 thru 41 LRTC 1, 2, 3, 4, and 5 Low Residence Time Chlorhydrinator	40 CFR 60.660 NSPS Subpart NNN – Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations	DOES NOT APPLY Column overhead liquid stream routed back to the process. Downstream emissions routed to a control device, Organic Chloride Incinerators, Emission Point Nos. 173 and 174.	
EQT 42 MLW-6 Marine ECH Loading	LAC 33:III.2108 Marine Vapor Recovery	EXEMPT The maximum true vapor pressure at loading temperature of the liquid is less than 1.5 psia.	
EQT 43 thru 50, 63, 64, and 69 T-B902, B904, B905, B906, C-931, C940, C941, V-6004A & B, and C412	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY A Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.110(b)(1)]	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 43 thru 47 T-B902, T-B904, T-B905, T-B906, T-C907	LAC 33:II 2103 Storage of Volatile Organic Compounds	DOES NOT APPLY The maximum true vapor pressure of the stored contents, at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.
EQT 52 and 53 T-C991 and T-C992	40 CFR 60 110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY A Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.110(b)(1)]	
EQT 54, 55, and 56 T-C980, C993, C994, and C996 – HCl Tanks	40 CFR 60 110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY Maximum True Vapor Pressure of stored VOL's is less than 3.5 kPa or tank was constructed prior to July 23, 1984. Not modified or reconstructed since.	
EQT 57 thru 62 ACHE, SGAC and ECH Tank Car and Tank Truck Loading Operations	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a HON storage vessel as per 40 CFR 63.101.	
EQT 65 and 66 V-C207 and 208 Allyl Chloride Reactors	LAC 33:II 2107 Volatile Organic Compounds - Loading	DOES NOT APPLY The maximum true vapor pressure at loading conditions is less than 1.5 psia. SGAC does not load more than 20,000 gal/day.	
	40 CFR 60 700 NSPS Subpart RRR – Standards of Performance for VOC Emission from SOCMI Reactor Processes	DOES NOT APPLY Constructed prior to June 29, 1990. Not modified or reconstructed since.	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL, UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source			
ID No:	Requirement	Compliance Method/Provision	Notes
EQT 67 V-C211 - Chloride Knockout Drum (Continued)	40 CFR 63.8595 NESHAP Subpart NNNNN — National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production	DOES NOT APPLY Does not meet the definition of an HCl process vent. 40 CFR 63.9000	
EQT 67 V-C211 - Chloride Knockout Drum (Continued)	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a process vent as per 40 CFR 63.107.	
EQT 68 V-C226 Raw Acid Skimmer	40 CFR 63.8595 NESHAP Subpart NNNNN — National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production	DOES NOT APPLY Does not meet the definition of an HCl process vent. 40 CFR 63.9000	
EQT 70, 71, and 72 V-C901, C902, and C903 Allyl Chloride Pressure	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY A Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.110(b)(1)]	
EQT 73 and 74 V-C905 and V-C906 Allyl Chloride Loading Vessels	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY A Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.110(b)(1)]	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 81 141 – Cooling Tower No. 2	40 CFR 63.400 NESHAP Subpart Q, National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	DOES NOT APPLY Chromium-based water treatment chemicals are not utilized.	
LAC 33:III.1311 Emission Standards for Particulate Matter (Including Standards from Some Specific Facilities) – Emission Limits		DOES NOT APPLY. Uncombined water is present. LAC 33:III.1311.F	
EQT 83.85, and 86 ECH Decontamination and Finished Tanks	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY. A Group 1 or Group 2 storage vessel that is also subject to the provisions of 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G. [40 CFR 63.110(b)(1)]	
LAC 33:III.2103 Storage of Volatile Organic Compounds		DOES NOT APPLY The maximum true vapor pressure of the stored contents, at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
EQT 84 T-C990 HCl Storage Tank	40 CFR 63.100 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	DOES NOT APPLY Not a HON storage vessel as per 40 CFR 63.101.	
	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY Maximum true vapor pressure of stored VOC's is less than 3.5 kPa.	
EQT 145 119 Vacuum Pump Water Collection Tank T-M701	40 CFR 60.110b NSPS Subpart Kb, Standards of Performance for VOL Storage for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	DOES NOT APPLY. Storage capacity less than 75 m ³ (19,813 gallons).	
EQT 145 119 Vacuum Pump Water Collection Tank T-M701 (Continued)	LAC 33:II.2103 Storage of Volatile Organic Compounds	DOES NOT APPLY The maximum true vapor pressure of the stored contents, at storage conditions, is less than 1.5 psia.	Maximum true vapor pressure of stored contents is less than 1.5 psia.
FUG 1 110 C-Unit Area Fugitive Emissions	40 CFR 61 Subpart V National Emission Standard for (Fugitive Emission Sources)	EXEMPT. Subject to 40 CFR 63 Subpart H. Since the unit is subject to HON requirements, the unit only has to comply with HON requirements.	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
FUG 4 227 CaCl Unit Area Fugitive Emissions	40 CFR 60.480 NSPS Subpart VV, Standards of Performance for Equipment Leaks of VOC in SOCMI	DOES NOT APPLY Does not manufacture SOCMI Chemicals.	
40 CFR 61.240	NESHAP Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources)	DOES NOT APPLY No Streams within this unit contain or contact process fluids that are at least 10% VHAP or VTAP by weight.	
40 CFR 63.160	NESHAP Subpart H, National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks	DOES NOT APPLY The CaCl ₂ Unit does not contain streams that are in contact with or contain a fluid that is at least 5% by weight Total Organic HAP.	
LAC 33:III.2111	Control of Emission of Organic Compounds – Pumps and Compressors	DOES NOT APPLY There are no streams in the CaCl ₂ Unit containing VOCs with a true vapor pressure of 1.5 psia or greater at handling conditions.	
LAC 33:III.2121	Fugitive Emission Control	EXEMPT Streams in the CaCl ₂ Unit does not meet contain or contact or contain fluids that are greater than 10% VOC, by volume. LAC 33:III.2121.B.4.a	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

XI. Explanation from Exemption Status or Non-Applicability or a Source

ID No:	Requirement	Compliance Method/Provision	Notes
FUG 5 228 CaCl ₂ Unit Wastewater Fugitive Emissions	40 CFR 63.100 NESHAP Subpart F, National Emission Standards for Organic Hazardous Air Pollutants from SOCM _I	DOES NOT APPLY The CaCl ₂ Unit does not meet the applicable criteria specified in 40 CFR 63.100.	
40 CFR 63.110 NESHAP Subpart G, National Emission Standards for Organic Hazardous Air Pollutants From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater LAC 33:II.211 Control of Emission of Organic Compounds – Pumps and Compressors	DOES NOT APPLY The CaCl ₂ Unit does not meet the applicable criteria specified in 40 CFR 63.100.		
FUG 7 232 ECH Finishing Section Fugitive Emissions	40 CFR 61 Subpart V National Emission Standard for (Fugitive Emission Sources)	EXEMPT. Subject to 40 CFR 63 Subpart H. Since the unit is subject to HON requirements, the unit only has to comply with HON requirements.	

General Information

All ID: 87883 Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-Y3
Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	2520-00088	CDS Number	CDS Number	01-08-2001
	80262-11	EPA EIS Facility Site ID	EPA EIS Facility Site ID	01-01-2008
	76-0607613	Federal Tax ID	Federal Tax ID	10-10-2000
LAD980622104		Hexion Specialty Chemicals Inc	Hazardous Waste Notification	06-03-2005
LA0120855		LPDES #	LPDES Permit #	06-13-2005
		Priority 1 Emergency Site	Priority 1 Emergency Site	07-19-2006
		Radioactive Material License	Radiation License Number	10-10-2000
LA-10324-L-01		SW Generator ID #	Solid Waste Facility No.	08-14-2007
G-089-10872		Resolution Performance Products	TEMPO Merge	02-21-2001
86894		TRI #	Toxic Release Inventory	07-19-2004
			Main Phone:	5044726585
			Phone (Type)	
			Relationship	
Physical Location:	16122 River Rd Lot 3 Norco, LA 70079	Coordinate Method: Lat/Long - DMS. Coordinate Datum: NAD83		
Mailing Address:	16122 River Rd Norco, LA 70079			
Location of Front Gate:	30.002406 latitude, -90.423511 longitude			
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Ed Ivey	16122 River Rd Norco, LA 70079	5044726550 (WP)	Responsible Official for
	Ed Ivey	16122 River Rd Norco, LA 70079	ed.ivey@hexion.com	Responsible Official for
	Ed Ivey	16122 River Rd Norco, LA 70079	ed.ivey@hexion.com	Water Billing Party for
	Ed Ivey	16122 River Rd Norco, LA 70079	5044726550 (WP)	Water Billing Party for
	Ed Ivey	16122 River Rd Norco, LA 70079	ed.ivey@hexion.com	Air Permit Contact For
	Ed Ivey	16122 River Rd Norco, LA 70079	5044726550 (WP)	Air Permit Contact For
	Michael Naquin	michael.naquin@hex	michael.naquin@hex	Radialion Safety Officer for
	Michael Naquin	5044726558 (WP)	5044726558 (WP)	Radialion Safety Officer for
	Michael Naquin	8173752739 (WF)	8173752739 (WF)	Radialion Safety Officer for
	Katie Ricks	5044726583 (WP)	5044726583 (WP)	Accident Prevention Contact for
	Katie Ricks	katherine.ricks@hex	katherine.ricks@hex	Accident Prevention Contact for
	Katie Ricks	5044726583 (WP)	5044726583 (WP)	Haz. Waste Billing Party for
	Katie Ricks	katherine.ricks@hex	katherine.ricks@hex	Haz. Waste Billing Party for
	Katie Ricks	5044726583 (WP)	5044726583 (WP)	Accident Prevention Billing Party for
	Katie Ricks	katherine.ricks@hex	katherine.ricks@hex	Emission Inventory Contact for
	Katie Ricks	5044726583 (WP)	5044726583 (WP)	Emission Inventory Contact for
	Katie Ricks	katherine.ricks@hex	katherine.ricks@hex	Hazardous Waste Permit Contact For

General Information

AI ID: 87883 Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-V3

Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Katie Ricks	16122 River Rd Norco, LA 70079	504-472-6563 (WP)	Hazardous Waste Permit Contact For
	Katie Ricks	16122 River Rd Norco, LA 70079	katherine.ricks@hex	Water Permit Contact For
	Katie Ricks	16122 River Rd Norco, LA 70079	504-472-6563 (WP)	Water Permit Contact For
	Katie Ricks	16122 River Rd Norco, LA 70079	katherine.ricks@hex	Accident Prevention Billing Party for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Hexion Specialty Chemicals Inc	16122 River Rd Norco, LA 70079	504-472-6550 (WP)	Radiation Licensee Billing Party for
	Hexion Specialty Chemicals Inc	16122 River Rd Norco, LA 70079	504-472-6550 (WP)	Emission Inventory Billing Party
	Hexion Specialty Chemicals Inc	16122 River Rd Norco, LA 70079	504-472-6550 (WP)	Owes
	Hexion Specialty Chemicals Inc	16122 River Rd Norco, LA 70079	504-472-6550 (WP)	Air Billing Party for

NAIC Codes:
325199, All Other Basic Organic Chemical Manufacturing

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
C-Unit, CaCl Unit, and ECH Finishing System						
ARE 0001	112 - Limestone Storage and Handling			73179 tons/yr		8760 hr/yr
EQT 0005	101 - Propylene Preheater (F-C201)		9.5 MM BTU/hr	9 MM BTU/hr		8760 hr/yr
EQT 0006	102 - ECH Stripper Bottoms Hydrolysis Tank (T-T101)	75000 gallons	200 gallons/min	200 gallons/min		8760 hr/yr
EQT 0007	103 - 37% HCl Vent Scrubber (C-C910)		10 gallons/min	1 gallons/min		8760 hr/yr
EQT 0008	104-A - Cl Absorber Vents (C-VG901C)		2575 lb/hr	.53 gallons/min		8760 hr/yr
EQT 0009	104-B - Cl Absorber (C-VG902C)		2575 lb/hr	.53 gallons/min		8760 hr/yr
EQT 0010	105 - Isopropanol Tank (T-ST253)	3700 gallons	500 bbl/yr	500 bbl/yr		8760 hr/yr
EQT 0011	109 - Cooling Tower (CW-T-12)		48000 gallons/min	48000 gallons/min		8760 hr/yr
EQT 0012	111 - CaCl Dissolver Vent Scrubber (C-C603)		3568 SCFM	3568 SCFM		8760 hr/yr
EQT 0014	191 - HCl Storage Tank (T-U551)	68400 gallons		42.05 MM gallons/yr		8760 hr/yr
EQT 0015	192 - HCl Storage tank (T-U552)	68400 gallons		42.05 MM gallons/yr		8760 hr/yr
EQT 0016	193 - ECH Stripper Bottoms Equalization Tank (T-T102)	750000 gallons		2000 gallons/min		8760 hr/yr
EQT 0017	201 - Lime Silo (V-C801)		600 SCFM	450 SCFM		8760 hr/yr
EQT 0018	202 - Lime Silo (V-C803)		600 SCFM	450 SCFM		8760 hr/yr
EQT 0019	210 - ECH Surge Pot Vent (V-C401)		5780 gallons	1525 gallons/min		8760 hr/yr
EQT 0020	211 - Isopropanol Storage Tank (T-SA102)	32000 gallons		40000 gallons/yr		8760 hr/yr
EQT 0023	229-A - HCl Tank Truck Loading Scrubber (C-C911)		10 gallons/min	1 gallons/min		8760 hr/yr
EQT 0024	229-B - HCl Tank Car Loading Scrubber (C-C980)		10 gallons/min	1 gallons/min		8760 hr/yr
EQT 0025	C-C201 - Prefractionator Column					8760 hr/yr
EQT 0026	C-C202 - HCl Absorber					8760 hr/yr
EQT 0027	C-C203 - HCl Absorber					8760 hr/yr
EQT 0028	C-C205 - Caustic Scrubber					8760 hr/yr
EQT 0029	C-C208 - HCl Stripper Column			100 gallons/min		8760 hr/yr
EQT 0030	C-C301 - AC Light Ends Column			85 gallons/min		8760 hr/yr
EQT 0031	C-C302 - AC Finishing Column			80 gallons/min		8760 hr/yr
EQT 0032	C-C305 - AC Sales Grade Column			20 gallons/min		8760 hr/yr
EQT 0033	C-C401 - ECH Stripper Column			2600 gallons/min		8760 hr/yr
EQT 0034	C-C403 - DCH Recovery Column					8760 hr/yr
EQT 0035	C-MB10 - ECH Light Ends Column			70 gallons/min		8760 hr/yr
EQT 0036	C-S101 - ECH Heavy Ends Column			70 gallons/min		8760 hr/yr
EQT 0037	LRTC#1 - Low Residence Time Chlorhydrinator					8760 hr/yr
EQT 0038	LRTC#2 Low Residence Time Chlorhydrinator					8760 hr/yr
EQT 0039	LRTC#3 - Low Residence Time Chlorhydrinator					8760 hr/yr
EQT 0040	LRTC#4 - Low Residence Time Chlorhydrinator					8760 hr/yr
EQT 0041	LRTC#5 - Low Residence Time Chlorhydrinator					8760 hr/yr
EQT 0042	MLW-6 - Marine ECH Loading				(None Specified)	8760 hr/yr
EQT 0043	T-B902 - Crude ECH Tank	677000 gallons	250 gallons/min	29 MM gallons/yr		8760 hr/yr
EQT 0044	T-B904 - Crude TCP Tank	340000 gallons	35 gallons/min	3.7 MM gallons/yr		8760 hr/yr
EQT 0045	T-B905 - Finished ECH Tank	505000 gallons	250 gallons/min	26 MM gallons/yr		8760 hr/yr

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
C-Unit, CaCl Unit, and ECH Finishing System						
EQT 0046	T-B906 - Finished ECH Tank	505000 gallons	250 gallons/min	26 MM gallons/yr		8760 hr/yr
EQT 0047	T-C907 - TCP Residue Tank	62000 gallons	35 gallons/min	2.7 MM gallons/yr		8760 hr/yr
EQT 0048	T-C931 - Finished AC Tank	84000 gallons	57 gallons/min	28 MM gallons/yr		8760 hr/yr
EQT 0049	T-C940 - Finished AC Tank	84000 gallons	57 gallons/min	28 MM gallons/yr		8760 hr/yr
EQT 0050	T-C941 - Finished AC Tank	84000 gallons	57 gallons/min	28 MM gallons/yr		8760 hr/yr
EQT 0051	T-C980 - HCl Tank	150000 gallons				8760 hr/yr
EQT 0052	T-C991 - AC Heavy Ends Tank	62000 gallons	12 gallons/min	4.5 MM gallons/yr		8760 hr/yr
EQT 0053	T-C992 - AC heavy Ends Tank	62000 gallons	12 gallons/min	4.5 MM gallons/yr		8760 hr/yr
EQT 0054	T-C993 - HCl Tank	59500 gallons				8760 hr/yr
EQT 0055	T-C994 - HCl Tank	56870 gallons				8760 hr/yr
EQT 0056	T-C996 - HCl Tank	56870 gallons				8760 hr/yr
EQT 0057	T-CW-12 - AC Heavy Ends TC Loading		70 gallons/min			8760 hr/yr
EQT 0058	T-CW-8 - Sales Grade AC TC Loading					8760 hr/yr
EQT 0059	T-CW-X - Finished ECH TC Loading			210 gallons/min		8760 hr/yr
EQT 0060	T-TW-5 - Sales Grade AC TT Loading			100 gallons/min		8760 hr/yr
EQT 0061	T-TW-9 - AC Heavy Ends TT Loading			70 gallons/min		8760 hr/yr
EQT 0062	T-TW-X - Finished ECH TT Loading			210 gallons/min		8760 hr/yr
EQT 0063	V-6004A - Crude AC Sphere	126000 gallons	87 gallons/min	35 MM gallons/yr		8760 hr/yr
EQT 0064	V-6004B - Crude AC Sphere	126000 gallons	87 gallons/min	35 MM gallons/yr		8760 hr/yr
EQT 0065	V-C207 - AC Reactor					8760 hr/yr
EQT 0066	V-C208 - AC Reactor	1030 gallons	24 gallons/min	11 MM gallons/yr		8760 hr/yr
EQT 0067	V-C211 - Chloride Knockout Drum					8760 hr/yr
EQT 0068	V-C226 - Raw Acid Skimmer					8760 hr/yr
EQT 0069	V-C412 - Decontamination Vessel	20000 gallons				8760 hr/yr
EQT 0070	V-C901 - AC Pressure Vessel	56000 gallons	15 gallons/min	7.7 MM gallons/yr		8760 hr/yr
EQT 0071	V-C902 - AC Pressure Vessel	56000 gallons	15 gallons/min	7.7 MM gallons/yr		8760 hr/yr
EQT 0072	V-C903 - AC Pressure Vessel	56000 gallons	15 gallons/min	7.7 MM gallons/yr		8760 hr/yr
EQT 0073	V-C905 - AC Tank TC Purge Vessel	600 gallons	85 gallons/min	7.7 MM gallons/yr		8760 hr/yr
EQT 0074	V-C906 - AC Tank TT Loading Vessel	6430 gallons	100 gallons/min	7.7 MM gallons/yr		8760 hr/yr
EQT 0081	1411 Cooling Tower No. 2		360000 gallons/min	360000 gallons/min		8760 hr/yr
EQT 0082	2333 - Site Gasoline/Diesel Storage Tank	1500 gallons		95000 gallons		8760 hr/yr
EQT 0083	T-S971 - ECH Decontamination Tank		300000 gallons			8760 hr/yr
EQT 0084	T-C990 - HCl Storage Tank	336000 gallons				8760 hr/yr
EQT 0085	T-M943 - Finished ECH Rundown Tank	144000 gallons	100 gallons/min	26 MM gallons/yr		8760 hr/yr
EQT 0086	T-M944 - Finished ECH Rundown Tank	144000 gallons	100 gallons/min	26 MM gallons/yr		8760 hr/yr
EOT 0145	119 - Vacuum Pump Water Collection Tank T-M701	750 gallons		87600 gallons/yr		8760 hr/yr
FUG 0001	110 - C-Unit Area Fugitive Emissions					8760 hr/yr
FUG 0002	218 - C-Unit Wastewater Fugitive Emissions					8760 hr/yr
FUG 0004	227 - CaCl Unit Area Fugitive Emissions					8760 hr/yr

INVENTORIES

AI ID: 8788B3 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
C-Unit, CaCl Unit, and ECH Finishing System						
FUG 0005	228 - CaCl Unit Wastewater Fugitive Emissions					8760 hr/yr
FUG 0006	231 - 37% HCl Area Fugitive Emissions					8760 hr/yr
FUG 0007	232 - ECH Finishing Section Fugitive Emissions					8760 hr/yr

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
C-Unit, CaCl Unit, and ECH Finishing System							
EQT 0005 101	- Propylene Preheater (F-C201)	17.8	4240	2.25		63.2	720
EQT 0006 102	- ECH Stripper Bottoms Hydrolysis Tank (T-T101)	20	79			26	212
EQT 0007 103	- 37% HCl Vent Scrubber (C-C910)	1	5	.67		16	70
EQT 0008 104-A	- Cl Absorber Vents (C-VC901C)	.01	.03	.83		22	130
EQT 0009 104-B	- Cl Absorber (C-VC902C)	.01	.03	.83		22	130
EQT 0010 105	- Isopropanol Tank (T-ST253)					10	
EQT 0011 109	- Cooling Tower (CWT-12)	28.5	907200			50	100
EQT 0012 111	- CaCl Dissolver Vent Scrubber (C-C803)	40	3340	1.3		40	120
EQT 0014 191	- HCl Storage Tank (T-U551)					24	
EQT 0015 192	- HCl Storage tank (T-U552)					24	
EQT 0016 193	- ECH Stripper Bottoms Equalization Tank (T-T102)					20	
EQT 0017 201	- Lime Silo (V-C801)	10	600			70	80
EQT 0018 202	- Lime Silo (V-C803)	10	600			70	80
EQT 0019 210	- ECH Surge Pot Vent (V-C401)	.01	2	3		40	130
EQT 0020 211	- Isopropanol Storage Tank (T-SA102)					24	
EQT 0023 229-A	- HCl Tank Truck Loading Scrubber (C-C911)	13	150	.5		12	80
EQT 0024 229-B	- HCl Tank Car Loading Scrubber (C-C980)	13	150	.5		12	80
FUG 0005 228	- CaCl Unit Wastewater Fugitive Emissions	0	0	0		0	0

Relationships:

ID	Description	Relationship	ID	Description
EQT 0028	C-C205 - Caustic Scrubber	Controls emissions from	EQT 0027	C-C203 - HCl Absorber
EQT 0028	C-C205 - Caustic Scrubber	Controls emissions from	EQT 0026	C-C202 - HCl Absorber
EQT 0051	T-C980 - HCl Tank	Vents to	EQT 0007	103 - 37% HCl Vent Scrubber (C-C910)
EQT 0054	T-C993 - HCl Tank	Vents to	EQT 0007	103 - 37% HCl Vent Scrubber (C-C910)
EQT 0055	T-C994 - HCl Tank	Vents to	EQT 0007	103 - 37% HCl Vent Scrubber (C-C910)

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT 0056	T-C996 - HCI Tank	Vents to	EQT 0007	103 - 37% HCI Vent Scrubber (C-C910)
EQT 0084	T-C990 - HCI Storage Tank	Vents to	EQT 0007	103 - 37% HCI Vent Scrubber (C-C910)
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0035	C-M610 - ECH Light Ends Column
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0036	C-S101 - ECH Heavy Ends Column
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0037	LRTC#1 - Low Residence Time Chlorohydrinator
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0038	LRTC#2 - Low Residence Time Chlorohydrinator
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0039	LRTC#3 - Low Residence Time Chlorohydrinator
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0040	LRTC#4 - Low Residence Time Chlorohydrinator
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0041	LRTC#5 - Low Residence Time Chlorohydrinator
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0042	MLW-6 - Marine ECH Loading
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0043	T-B902 - Crude ECH Tank
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0044	T-B904 - Crude TCP Tank
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0046	T-B906 - Finished ECH Tank
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0047	T-C907 - TCP Residue Tank
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0048	T-C931 - Finished AC tank
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0049	T-C940 - Finished AC Tank

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
GRP 0008	devices.			
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0050	T-C941 - Finished AC Tank	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0052	T-C991 - AC Heavy Ends Tank	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0053	T-C992 - AC heavy Ends Tank	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0057	TCW-12 - AC Heavy Ends TC Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0058	TCW-8 - Sales Grade AC TC Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0059	TCW-X - Finished ECH TC Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0060	TTW-5 - Sales Grade AC TT Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0061	TTW-9 - AC Heavy Ends TT Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0062	TTW-X - Finished ECH TT Loading	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0063	V-6004A - Crude AC Sphere	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0064	V-6004B - Crude AC Sphere	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0069	V-C412 - Decontamination Vessel	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0070	V-C901 - AC Pressure Vessel	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0071	V-C902 - AC Pressure Vessel	
GRP 0008	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 [Controls emissions from and 174 in Hazardous Waste Incinerators Permit, used as control devices.	EQT 0072	V-C903 - AC Pressure Vessel	

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

Relationships		Description	Relationship	ID	Description
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0073	V-C905 - AC Tank TC Purge Vessel	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0074	V-C906 - AC Tank TT Loading Vessel	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0083	T-S971 - ECH Decontamination Tank	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0085	T-M943 - Finished ECH Rundown Tank	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0034	C-C403 - DCH Recovery Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0033	C-C401 - ECH Stripper Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0032	C-C305 - AC Sales Grade Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0031	C-C302 - AC Finishing Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0030	C-C301 - AC Light Ends Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0029	C-C208 - HCL Stripper Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0025	C-C201 - Prefractionator Column	
GRP 0008	173 and 174 - Organic Chloride Incinerators Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.	Controls emissions from	EQT 0045	T-B905 - Finished ECH Tank	

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	Columns - C-C201, C-C301, C-C302, C-C305, C-C401, C-M610, C-S101 Common Requirements
CRG 0002	Common Requirements Group	Loading - Loading Operations Applicable to the HCN
CRG 0003	Common Requirements Group	HON Tanks - Group 1 HON Tank Common Requirements
CRG 0004	Common Requirements Group	HCl Tanks - HCl Tank Common Requirements
CRG 0005	Common Requirements Group	HON Tanks - HON Tank Requirements Without 2103 Applicability

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

Subject Item Groups:

ID	Group Type	Group Description
GRP 0006	Equipment Group	104 - Cl Absorber Vents Cap
GRP 0007	Equipment Group	229 - HCl Loading Cap
GRP 0008	Equipment Group	173 and 174 - Organic Chloride Incinerators, Emission Point No. 173 and 174 in Hazardous Waste Incinerators Permit, used as control devices.
JNF 0003	Unit or Facility Wide	Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

Group Membership:

ID	Description	Member of Groups
EQT 0008	104-A - Cl Absorber Vents (C-VC901C)	GRP000000000006
EQT 0009	104-B - Cl Absorber (C-VC902C)	GRP000000000006
EQT 0023	229-A - HCl Tank Truck Loading Scrubber (C-C911)	GRP000000000007
EQT 0024	229-B - HCl Tank Car Loading Scrubber (C-C980)	GRP000000000007
EQT 0025	C-C2011 - Prefractionator Column	CRG0000000001, GRP000000000008
EQT 0029	C-C2018 - HCl Stripper Column	GRP000000000008
EQT 0030	C-C301 - AC Light Ends Column	CRG0000000001, GRP000000000008
EQT 0031	C-C302 - AC Finishing Column	CRG0000000001, GRP000000000008
EQT 0032	C-C305 - AC Sales Grade Column	CRG0000000001, GRP000000000008
EQT 0033	C-C401 - ECH Stripper Column	CRG0000000001, GRP000000000008
EQT 0034	C-C403 - DCH Recovery Column	CRG0000000001, GRP000000000008
EQT 0035	C-M610 - ECH Light Ends Column	CRG0000000001, GRP000000000008
EQT 0036	C-S101 - ECH Heavy Ends Column	CRG0000000001, GRP000000000008
EQT 0037	LRTC#1 - Low Residence Time Chlorhydrinator	GRP0000000008
EQT 0038	LRTC#2 - Low Residence Time Chlorhydrinator	GRP0000000008
EQT 0039	LRTC#3 - Low Residence Time Chlorhydrinator	GRP0000000008
EQT 0040	LRTC#4 - Low Residence Time Chlorhydrinator	GRP0000000008
EQT 0041	LRTC#5 - Low Residence Time Chlorhydrinator	GRP0000000008
EQT 0042	MLW-6 - Marine ECH Loading	CRG0000000002, GRP000000000008
EQT 0043	T-B902 - Crude ECH Tank	GRP0000000008
EQT 0044	T-B904 - Crude TCP Tank	GRP0000000008
EQT 0045	T-B905 - Finished ECH Tank	CRG0000000005, GRP000000000008
EQT 0046	T-B906 - Finished ECH Tank	CRG0000000005, GRP000000000008
EQT 0047	T-C907 - TCP Residue Tank	CRG0000000005, GRP000000000008
EQT 0048	T-C911 - Finished AC tank	CRG0000000003, GRP000000000008
EQT 0049	T-C940 - Finished AC Tank	CRG0000000003, GRP000000000008
EQT 0050	T-C941 - Finished AC Tank	CRG0000000003, GRP000000000008
EQT 0051	T-C980 - HCl Tank	CRG0000000004
EQT 0052	T-C991 - AC Heavy Ends Tank	CRG0000000003, GRP000000000008
EQT 0053	T-C992 - AC heavy Ends Tank	CRG0000000003, GRP000000000008
EQT 0054	T-C993 - HCl Tank	CRG0000000004
EQT 0055	T-C994 - HCl Tank	CRG0000000004

INVENTORIES

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
EQT 0056	T-C998 - HCl Tank	CRG0000000004
EQT 0057	TCW-12 - AC Heavy Ends TC Loading	CRG0000000002, GRP0000000008
EQT 0058	TCW-8 - Sales Grade AC TC Loading	CRG0000000002, GRP0000000008
EQT 0059	TCW-X - Finished ECH TC Loading	CRG0000000002, GRP0000000008
EQT 0060	TTW-5 - Sales Grade AC TT Loading	CRG0000000002, GRP0000000008
EQT 0061	TTW-9 - AC Heavy Ends TT Loading	CRG0000000002, GRP0000000008
EQT 0062	TTW-X - Finished ECH TT Loading	CRG0000000002, GRP0000000008
EQT 0063	V-6004A - Crude AC Sphere	CRG0000000003, GRP0000000008
EQT 0064	V-6004B - Crude AC Sphere	CRG0000000003, GRP0000000008
EQT 0069	V-C412 - Decontamination Vessel	CRG0000000003, GRP0000000008
EQT 0070	V-C901 - AC Pressure Vessel	CRG0000000003, GRP0000000008
EQT 0071	V-C902 - AC Pressure Vessel	CRG0000000003, GRP0000000008
EQT 0072	V-C903 - AC Pressure Vessel	CRG0000000003, GRP0000000008
EQT 0073	V-C905 - AC Tank TC Purge Vessel	CRG0000000003, GRP0000000008
EQT 0074	V-C906 - AC Tank TT Loading Vessel	CRG0000000003, GRP0000000008
EQT 0083	T-S9711 - ECH Decontamination Tank	CRG0000000003, GRP0000000008
EQT 0084	T-C980 - HCl Storage Tank	CRG0000000004
EQT 0085	T-M943 - Finished ECH Rundown Tank	CRG0000000005, GRP0000000008
EQT 0086	T-M944 - Finished ECH Rundown Tank	CRG0000000005, GRP0000000008

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multipplier	Units Of Measure
0620	0620 Halogenated Hydrocarbons (Rated Capacity)	246.2	MM lbs/yr
0500	0500 Industrial Inorganic Chemicals Mfg. N.E.C. (Rated Capacity)	354.3	MM lbs/yr

SIC Codes:

2819	Industrial inorganic chemicals, nec	AI 87883
2819	Industrial inorganic chemicals, nec	UNF 003
2821	Plastics materials and resins	AI 87883
2821	Plastics materials and resins	UNF 003
2869	Industrial organic chemicals, nec	AI 87883
2869	Industrial organic chemicals, nec	UNF 003

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 87883 - Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-Y3

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
C-Unit, CaCl Unit, and ECH Finishing System															
ARE 0001 112							0.45	0.45	1.97						
EOT 0005 101	0.79	0.92	3.44	0.93	1.10	4.09	0.07	0.08	0.31	0.01	0.03	0.05	0.06	0.23	
EOT 0006 102												0.31	0.47	1.35	
EOT 0007 103												0.005	0.04	0.02	
EOT 0010 105												0.03	6.30	0.12	
EOT 0011 108							3.42	4.10	14.98			2.02	2.42	8.83	
EOT 0012 111							0.18	32.00	0.70			7.17	13.52	31.39	
EOT 0016 193												1.61	4.29	7.04	
EOT 0017 201							0.15	0.21	0.68						
EOT 0018 202							0.15	0.21	0.68				0.02	0.19	0.08
EOT 0019 210												0.04	1.77	0.17	
EOT 0020 211													0.02		
EOT 0023 229-A													0.01		
EOT 0024 229-B															
EOT 0081 141							1.03	1.03	4.49			1.51	1.51	6.62	
EOT 0082 233												0.07	0.07	0.29	
EOT 0145 119												<0.01	<0.01	<0.01	
FUG 0001 110												9.02	9.02	38.92	
FUG 0002 218												1.54	3.50	6.75	
FUG 0005 228												0.11	0.29	0.47	
FUG 0007 232												4.34	4.34	19.02	
GRP 0007 229												0.01		0.04	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR CRITERIA POLLUTANTS

AID: 87883 - Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-V3

Air - Title V Regular Permit Renewal

Emission rates Notes:
GRF 0007 VOC

Tons/Year
This is the emissions cap for sources 229-A and 229-B. Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 87883 - Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EOT 0006 102	Epichlorohydrin	0.31	0.47	1.35
EOT 0007 103	Allyl chloride	<0.001	0.004	0.002
	Hydrochloric acid	0.13	0.97	0.57
EOT 0008 104-A	Chlorine		2.58	
EOT 0009 104-B	Chlorine		2.58	
EOT 0012 111	Allyl chloride	0.93	1.76	4.09
	Hydrochloric acid	0.11	0.21	0.48
EOT 0014 191	Hydrochloric acid	<0.001	0.01	0.002
EOT 0015 192	Hydrochloric acid	<0.001	0.01	0.001
EOT 0016 193	Epichlorohydrin	1.61	4.29	7.04
EOT 0019 210	Allyl chloride	0.01	0.05	0.02
	Chlorine	0.05	0.51	0.22
	Hydrochloric acid	<0.001	<0.001	<0.001
EOT 0023 229-A	Allyl chloride		0.001	
	Hydrochloric acid		0.43	
EOT 0024 229-B	Allyl chloride		0.001	
	Hydrochloric acid		0.35	
EOT 0082 233	Benzene	<0.001	<0.001	0.002
	Ethyl benzene	<0.001	<0.001	<0.001
	Toluene	0.001	0.001	0.002
	Xylene (mixed isomers)	<0.001	<0.001	0.001
	n-Hexane	<0.001	<0.001	0.002
EOT 0145 119	Epichlorohydrin	<0.001	<0.001	<0.001
FUG 0001 110	1,2-Dichloropropane	0.08	0.08	0.36
	1,3-Dichloropropene	0.13	0.13	0.58
	Acrolein	0.001	0.001	0.003
	Allyl chloride	1.56	1.56	6.84
	Benzene	0.001	0.001	0.002
	Chlorine	0.08	0.08	0.36
	Epichlorohydrin	2.15	2.15	9.41
	Hydrochloric acid	0.01	0.01	0.04
	Toluene	0.39	0.39	1.71
FUG 0002 218	1,2-Dichloropropane	0.001	0.002	0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 87883 - Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
FUG 0002 218	1,3-Dichloropropene	0.002	0.003	0.01
	Acrolein	0.03	0.14	0.14
	Allyl chloride	0.42	1.02	1.82
	Benzene	<0.001	<0.001	<0.001
	Epichlorohydrin	0.17	0.35	0.75
	Hydrochloric acid	0.66	1.36	2.87
FUG 0004 227	Hydrochloric acid	0.01	0.01	0.04
FUG 0005 228	Allyl chloride	0.11	0.29	0.47
FUG 0006 231	Hydrochloric acid	0.23	0.23	0.99
FUG 0007 232	1,3-Dichloropropene	0.02	0.02	0.07
	Acrolein	0.09	0.09	0.39
	Allyl chloride	0.01	0.01	0.05
	Epichlorohydrin	2.60	2.60	11.39
GRP 0006 104	Chlorine	0.54		2.39
GRP 0007 229	Allyl chloride	0.001		0.004
	Hydrochloric acid	0.26		1.14
UNF 0003 Norco Facility	1,2-Dichloropropane			0.37
	1,3-Dichloropropene			0.66
	Acrolein			0.533
	Allyl chloride			13.296
	Benzene			0.004
	Chlorine			2.97
	Epichlorohydrin			29.94
	Ethyl benzene			<0.001
	Hydrochloric acid			6.133
	Propylene oxide			0.07
	Toluene			1.712
	Xylene (mixed isomers)			0.001
	n-Hexane			0.002

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

GRP 0006	Chlorine	Tons/Year	This is the emissions cap for sources 104-A and 104-B. Which Months: All Year
GRP 0007	Hydrochloric acid	Tons/Year	This is the emissions cap for sources 229-A and 229-B. Which Months: All Year

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

ARE 0001 112 - Limestone Storage and Handling

- 1 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
- 2 [LAC 33:III.1311.C] Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Months: All Year Statistical Basis: Six-minute average

CRG 0001 Columns - C-C201, C-C301, C-C302, C-C305, C-C401, C-M610, C-S101 Common Requirements

Group Members: EQT 0031EQT 0030EQT 0031EQT 0032EQT 0033EQT 0035EQT 0036

- 3 [40 CFR 63.110(d)(4)] NSPS, Subpart NNN. A Group 1 process vent that is also subject to the provisions of 40 CFR Part 60, Subpart NNN is required to comply only with the provisions 40 CFR 63 Subpart G.
- 4 [40 CFR 63.113, 117, 118, 152] Permits shall comply with all the applicable requirements of 40 CFR 63, Subpart G - NESHAP From the SOCMI for Process Vents. 40 CFR 63.113(a)(2), 117, 118 and 152.
- 5 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). Sources are sent to the Organic Chloride Incinerators, Emission Point Nos. 173 and 174. Subpart G. [40 CFR 63.113(a)(2)]
- 6 [40 CFR 63.117(a)] Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(b)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]

CRG 0002 Loading - Loading Operations Applicable to the HON

Group Members: EQT 0042EQT 0057EQT 0058EQT 0059EQT 0060EQT 0061EQT 0062

- 7 [40 CFR 63.126(a)] Equip with a vapor collection system and control device. Subpart G. [40 CFR 63.126(a)]
- 8 [40 CFR 63.126(b)(1)] Organic HAP >= 98 % reduction by weight or exit concentration <= 20 ppmv, whichever is less stringent, using a control device. Sources are routed to the Organic Chloride Incinerators, Emission Point Nos. 173 and 174. Subpart G. [40 CFR 63.126(b)(1)]
- 9 [40 CFR 63.126(e)] Which Months: All Year Statistical Basis: None specified Load organic HAPs into only tank trucks and railcars which have a current certification in accordance with the U.S. Department of Transportation pressure test requirements of 49 CFR part 180 for tank trucks and 49 CFR 173.31 for railcars; or have been demonstrated to be vapor-tight within the preceding 12 months, as determined by the procedures in 40 CFR 63.128(f). Subpart G. [40 CFR 63.126(e)]
- 10 [40 CFR 63.126(f)] Load organic HAPs to only tank trucks or railcars equipped with vapor collection equipment that is compatible with the transfer rack's vapor collection system. Subpart G. [40 CFR 63.126(f)]
- 11 [40 CFR 63.126(g)] Load organic HAPs to only tank trucks or railcars whose collection systems are connected to the transfer rack's vapor collection systems. Subpart G. [40 CFR 63.126(g)]
- 12 [40 CFR 63.126(h)] Ensure that no pressure-relief device in the transfer rack's vapor collection system or in the organic HAPs loading equipment of each tank truck or railcar shall begin to open during loading. Subpart G. [40 CFR 63.126(h)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

CRG 0002 Loading - Loading Operations Applicable to the HON

13 [40 CFR 63.130] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.130(e) and (f). Subpart G.

CRG 0003 HON Tanks - Group 1 HON Tank Common Requirements

Group Members: EQT 0048EQT 0049EQT 0050EQT 0053EQT 0055EQT 0063EQT 0064EQT 0069EQT 0070EQT 0071EQT 0072EQT 0073EQT 0074EQT 0083

- 14 [40 CFR 63.119(a)(1)] Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
- 15 [40 CFR 63.119(a)(2)] Operate and maintain a closed-vent system and control device meeting the requirements specified in 40 CFR 63.119(e), route the emissions to a process or a fuel gas system as specified in 40 CFR 63.119(f), vapor balance as specified in 40 CFR 63.119(g), or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(2)]
- 16 [40 CFR 63.122(a)(1)] Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
- 17 [40 CFR 63.122(a)(3)] Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 18 [40 CFR 63.122(a)(4)] Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- 19 [40 CFR 63.122(a)(5)] Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- 20 [40 CFR 63.123] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- 21 [LAC 33:III.2|03.A or B] Maintain working pressures sufficient at all times under normal operating conditions to prevent vapor or gas loss to the atmosphere.
- 22 [LAC 33:III.2|03.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2|03.I.1 - 7, as applicable.

CRG 0004 HCl Tanks - HCl Tank Common Requirements

Group Members: EQT 0051EQT 0054EQT 0055EQT 0056EQT 0084

- 23 [40 CFR 63.9000(a)] Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Permittee shall comply with all the applicable requirements of 40 CFR 63, Subpart NNNNN - NESHAP for Hydrochloric Acid Production:40 CFR 63.1 thru 15, 63.9035 and 63.9045.
- 24 [40 CFR 63.9035,9045]

EQT 0005 101 - Propylene Preheater (F-C201)

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

EQT 0005 101 - Propylene Preheater (F-C201)

25 [LAC 33.II.1101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

26 [LAC 33.II.1311.C] Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

27 [LAC 33.II.1313.C] Which Months: All Year Statistical Basis: Six-minute average
 Total suspended particulate <= 0.6 lb/MMBTU of heat input.
 Which Months: All Year Statistical Basis: None specified

EQT 0006 102 - ECH Stripper Bottoms Hydrolysis Tank (T-T101)

28 [40 CFR 63.146, 147] Permittee shall comply with the requirements of 40 CFR 63, Subpart G - NESHAP From the SOCMI for Wastewater (40 CFR 63.146(b)(1) and 147(b)(8)).

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain applicable records specified in 40 CFR 63.147(a) through (f), as applicable. Subpart G. Include emissions of all toxic air pollutants listed in LAC 33.II.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33.III.5105.B.

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be compliance with the SOCMI HON.

EQT 0007 103 - 37% HCl Vent Scrubber (C-C910)

32 [40 CFR 63.900(a)] Hydrochloric acid >= 99 % reduction or <= 20 ppmv, except as noted in 40 CFR 63.900(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Maintain the operating parameter(s) within the operating limits established according to the monitoring plan established under 40 CFR 63.8(f), except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]

Demonstrate compliance as per 40 CFR 63.9020(c) and (e). Subpart NNNNN. pH monitored by CMS continuously. Monitor the scrubber effluent pH. Subpart NNNNN. [40 CFR 63.9025(a)]
 Which Months: All Year Statistical Basis: Daily average
 Flow rate monitored by CMS continuously. Monitor the scrubber inlet liquid or recirculating liquid flow rate. Subpart NNNNN. [40 CFR 63.9025(a)]

33 [40 CFR 63.900(b)] Which Months: All Year Statistical Basis: Daily average
 Submit a monitoring plan to DEQ that meets the requirements in 40 CFR 63.9025(a) and (b)(1) through (b)(3), in accordance with 40 CFR 63.8(f). Conduct monitoring in accordance with the plan submitted, unless comments received from DEQ require an alternate monitoring scheme. Subpart NNNNN. [40 CFR 63.9025(b)]

SPECIFIC REQUIREMENTS

AJ ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

EQT 0007 103 - 37% HCl Vent Scrubber (C-C910)

- 38 [40 CFR 63.9030(b)] Establish the site-specific operating limits(s) in 40 CFR 63 Subpart NNNNN, Table 2, as applicable, according to the requirement in 40 CFR 63.9020 and 40 CFR 63 Subpart NNNNN, Table 3. Subpart NNNNN. [40 CFR 63.9030(b)]
Flow rate recordkeeping by electronic or hard copy continuously. Record the scrubber inlet liquid or recirculating liquid flow rate. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(1)]
pH recordkeeping by electronic or hard copy continuously. Record the scrubber effluent pH. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(2)]
Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]
Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be compliance with 40 CFR 63 Subpart NNNNN.

EQT 0010 105 - Isopropanol Tank (T-ST253)

- 44 [LAC 33:III.2103.A] Equip with a submerged fill pipe.
Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT 0011 109 - Cooling Tower (CWT-12)

- 47 [40 CFR 63.402] Do not use chromium-based water treatment chemicals in any affected IPCT. Subpart Q.

EQT 0012 111 - CaCl Dissolver Vent Scrubber (C-C803)

- 48 [LAC 33:III.1311.B] Total suspended particulate <= 32 lb/hr. The rate of emission shall be the total of all emission points from the source.
Which Months: All Year Statistical Basis: None specified
Flow rate >= 52 gallons/min.
Which Months: All Year Statistical Basis: None specified
Flow rate recordkeeping by electronic or hard copy once every shift during operation.
Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance. This report can be combined with reports required under LAC 33:III.535.
Flow rate monitored by flow rate monitoring device once every shift during operation.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

EQT 0012 111 - CaCl Dissolver Vent Scrubber (C-C803)

- 53 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
 MACT is determined to be control by scrubber system.

EQT 0014 191 - HCl Storage Tank (T-U551)

- 55 [LAC 33:III.5107.A.2] Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0015 192 - HCl Storage tank (T-U552)

- 56 [LAC 33:III.5107.A.2] Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0016 193 - ECH Stripper Bottoms Equalization Tank (T-T102)

- 57 [40 CFR 63.146, 147] Permittee shall comply with the requirements of 40 CFR 63, Subpart G - NESHAP From the SOCMI for Wastewater (40 CFR 63.146(b)(1) and 147(b)(8).
 Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain applicable records specified in 40 CFR 63.147(a) through (f), as applicable. Subpart G.
 Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
 MACT is determined to be compliance with the SOCMI HON.

EQT 0017 201 - Lime Silo (V-C801)

- 61 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.
 Total suspended particulate <= 0.21 lb/hr. The rate of emission shall be the total of all emission points from the source.
 Which Months: All Year Statistical Basis: None specified

EQT 0018 202 - Lime Silo (V-C803)

- 63 [LAC 33:III.1305] Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

EQT 0019 210 - ECH Surge Pot Vent (V-C401)

- 64 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
 MACT is determined to be no additional controls.

EQT 0023 229-A - HCl Tank Truck Loading Scrubber (C-C911)

- 66 [40 CFR 63.9000(a)] Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Maintain the operating parameter(s) within the operating limits established according to the monitoring plan established under 40 CFR 63.8(f), except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]
 Demonstrate compliance as per 40 CFR 63.9020(c) and (e). Subpart NNNNN.
 Flow rate monitored by CMS continuously. Monitor the scrubber inlet liquid or recirculating liquid flow rate. Subpart NNNNN. [40 CFR 63.9025(a)]
 Which Months: All Year Statistical Basis: Daily average pH monitored by CMS continuously. Monitor the scrubber effluent pH. Subpart NNNNN. [40 CFR 63.9025(a)]
 Which Months: All Year Statistical Basis: Daily average Submit a monitoring plan to DEQ that meets the requirements in 40 CFR 63.9025(a) and (b)(1) through (b)(3), in accordance with 40 CFR 63.8(f). Conduct monitoring in accordance with the plan submitted, unless comments received from DEQ require an alternate monitoring scheme. Subpart NNNNN. [40 CFR 63.9025(b)]
 Establish the site-specific operating limit(s) in 40 CFR 63 Subpart NNNNN, Table 2, as applicable, according to the requirements in 40 CFR 63.9020 and 40 CFR 63 Subpart NNNNN, Table 3. Subpart NNNNN. [40 CFR 63.9030(b)]
 Flow rate recordkeeping by electronic or hard copy continuously. Record the scrubber inlet liquid or recirculating liquid flow rate. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(1)]
 pH recordkeeping by electronic or hard copy continuously. Record the scrubber effluent pH. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(2)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]
 Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ.
 MACT is determined to be compliance with 40 CFR 63 Subpart NNNNN.

EQT 0024 229-B - HCl Tank Car Loading Scrubber (C-C980)

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

EQT 0024 229-B - HCl Tank Car Loading Scrubber (C-C980)

- 78 [40 CFR 63.9000(a)] Hydrochloric acid >= 99 % reduction or <= 120 ppmv, except as noted in 40 CFR 63.9000(c) and (d). Subpart NNNNN. [40 CFR 63.9000(a)]
 Which Months: All Year Statistical Basis: None specified
 Maintain the operating parameter(s) within the operating limits established according to the monitoring plan established under 40 CFR 63.8(f), except as noted in 40 CFR 63.9000(c). Subpart NNNNN. [40 CFR 63.9000(b)]
 Demonstrate compliance as per 40 CFR 63.9020(c) and (e). Subpart NNNNN.
 Flow rate monitored by CMS continuously. Monitor the scrubber inlet liquid or recirculating liquid flow rate. Subpart NNNNN. [40 CFR 63.9025(a)]
 Which Months: All Year Statistical Basis: Daily average pH monitored by CMS continuously. Monitor the scrubber effluent pH. Subpart NNNNN. [40 CFR 63.9025(a)]
 Which Months: All Year Statistical Basis: Daily average
 Submit a monitoring plan to DEQ that meets the requirements in 40 CFR 63.9025(a) and (b)(1) through (b)(3), in accordance with 40 CFR 63.8(f). Conduct monitoring in accordance with the plan submitted, unless comments received from DEQ require an alternate monitoring scheme. Subpart NNNNN. [40 CFR 63.9025(b)]
 Establish the site-specific operating limits in 40 CFR 63 Subpart NNNNN, Table 2, as applicable, according to the requirements in 40 CFR 63.9020 and 40 CFR 63 Subpart NNNNN, Table 3. Subpart NNNNN. [40 CFR 63.9030(b)]
 Flow rate recordkeeping by electronic or hard copy continuously. Record the scrubber inlet liquid or recirculating liquid flow rate. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(1)]
 pH recordkeeping by electronic or hard copy continuously. Record the scrubber effluent pH. For each hour that there is valid data from at least four equally spaced periods, calculate the hourly average using all of the valid data, as specified in 40 CFR 63.9025(a). Subpart NNNNN. [40 CFR 63.9035(b)(2)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN, Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]
 Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be compliance with 40 CFR 63 Subpart NNNNN.
- 82 [40 CFR 63.9025(a)]
 83 [40 CFR 63.9025(b)]
 84 [40 CFR 63.9030(b)]
 85 [40 CFR 63.9035(b)(1)]
 86 [40 CFR 63.9035(b)(2)]
 87 [40 CFR 63.9040(a)]
 88 [LAC 33:III.5107.A.2]
 89 [LAC 33:III.5109.A.1]

EQT 0043 T-B902 - Crude ECH Tank

- 90 [40 CFR 63.122.123(a)] Permittee shall comply with all the applicable requirements of 40 CFR 63, Subpart G - NESHAAP From the SOCMF for Storage Vessels. 40 CFR 63.122, 123 and 152.
 Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
- 91 [40 CFR 63.123(a)]

EQT 0044 T-B904 - Crude TCP Tank

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

EQT 0044 T-B904 - Crude TCP Tank

- 92 [40 CFR 63.122.123(a)] Permittee shall comply with all the applicable requirements of 40 CFR 63, Subpart G - NESHAP From the SOCM1 for Storage Vessels. 40 CFR 63.122, 123 and 152.
 Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT 0081 141 - Cooling Tower No. 2

- 94 [40 CFR 63.402] Do not use chromium-based water treatment chemicals in any affected IPCT. Subpart Q.

EQT 0082 233 - Site Gasoline/Diesel Storage Tank

- 95 [LAC 33:II.2103.A] Equip with a submerged fill pipe.
 Determine VOC maximum true vapor pressure using the methods in LAC 33:II.2103.H.3.a-e.
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in LAC 33:II.2103.I.1 - 7, as applicable.

EQT 0083 T-S971 - ECH Decontamination Tank

- 98 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

EQT 0145 119 - Vacuum Pump Water Collection Tank T-M701

- 99 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
 Include emissions of all toxic air pollutants listed in LAC 33:II.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:II.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be compliance with 40 CFR 63 Subpart G (Group 2 HON Storage Tank).

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 102 [40 CFR 60 Subpart VV] Comply with 40 CFR 60 Subpart VV by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63 Subpart H, HON. See Part 70 Specific Condition in Appendix A.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 103 [40 CFR 63.162(c)] Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63
Subpart H. Subpart H. [40 CFR 63.162(c)]
- 104 [40 CFR 63.162(l)] Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(l)(3) and 63.175(e)(i)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]
- 105 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (j). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase III; pumps handling polymerizing monomers), 2,000 ppm (phase III; pumps in food/medical service), or 1,000 ppm (phase III; all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
- 106 [40 CFR 63.163(b)(3)] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
- 107 [40 CFR 63.163(c)] Which Months: All Year Statistical Basis: None specified Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- 108 [40 CFR 63.163(d)(2)] Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if, in Phase II, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- 109 [40 CFR 63.163(d)(4)] Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- 110 [40 CFR 63.163(e)(1)] Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure, or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172, or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)]
- 111 [40 CFR 63.163(e)(2)] Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)]
- 112 [40 CFR 63.163(e)(3)] Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(3)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG_0001 110 - C-Unit Area Fugitive Emissions

- 113 [40 CFR 63.163(c)(4)] Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(c)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- Which Months: All Year Statistical Basis: None specified
- 114 [40 CFR 63.163(e)(6)(i)] Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- 115 [40 CFR 63.163(e)(6)] Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]
- 116 [40 CFR 63.163(e)] Pumps in light liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)]
- Which Months: All Year Statistical Basis: None specified
- 117 [40 CFR 63.163(j)(1)] Pumps in light liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(1)]
- 118 [40 CFR 63.163(j)(2)] Pumps in light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- 119 [40 CFR 63.164(a)] Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]
- 120 [40 CFR 63.164(b)] Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]
- 121 [40 CFR 63.164(c)] Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]
- 122 [40 CFR 63.164(d)] Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]
- 123 [40 CFR 63.164(e)(2)] Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Speciality Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 124 [40 CFR 63.164(g)] Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]
- 125 [40 CFR 63.164(i)(2)] Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Comply with this requirement instead of the requirements in 40 CFR 63.164(a) through (h). Subpart H. [40 CFR 63.164(i)(2)]
- 126 [40 CFR 63.164] Which Months: All Year Statistical Basis: None specified
 Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.
- 127 [40 CFR 63.165(a)] Which Months: All Year Statistical Basis: None specified
 Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
- 128 [40 CFR 63.165(b)(1)] Which Months: All Year Statistical Basis: None specified
 Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- 129 [40 CFR 63.165(b)(2)] Pressure relief devices in gas/vapor service (rupture disk): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
- 130 [40 CFR 63.165(d)(2)] Which Months: All Year Statistical Basis: None specified
 Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]
- 131 [40 CFR 63.166] Sampling connection systems: Equip with a closed-purge, closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- 132 [40 CFR 63.167] Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- 133 [40 CFR 63.168(c)] Valves in gas/vapor service or liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc

Activity Number: PER20080003

Permit Number: 2869-V3

Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 134 [40 CFR 63.168(c)] Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (d)(4). Subpart H. [40 CFR 63.168(d)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(e)(3)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(h)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(3)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 144 [40 CFR 63.169(a)] Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/medical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]
- 145 [40 CFR 63.169(c)] Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.119(b) or (c), if surge control vessel or bottoms receiver is not routed back to the process and meets the conditions specified in 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.
- Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
- Which Months: All Year Statistical Basis: None specified
- Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 153 [40 CFR 63.172(k)(2)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(l)(1) and (l)(2). Subpart H. [40 CFR 63.172(k)(2)]
- 154 [40 CFR 63.172(l)(1)] Which Months: All Year Statistical Basis: None Specified Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(l)(1) and (l)(2). Subpart H. [40 CFR 63.172(l)(1)]
- 155 [40 CFR 63.172(l)(2)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(l)(1) and (l)(2). Subpart H. [40 CFR 63.172(l)(2)]
- 156 [40 CFR 63.172(m)] Which Months: All Year Statistical Basis: None Specified Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 157 [40 CFR 63.173(a)] Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
- 158 [40 CFR 63.173(b)] Which Months: All Year Statistical Basis: None Specified Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
- 159 [40 CFR 63.173(c)] Which Months: All Year Statistical Basis: None Specified Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(c)]
- 160 [40 CFR 63.173(d)(1)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(1)]
- 161 [40 CFR 63.173(d)(2)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(2)]
- 162 [40 CFR 63.173(d)(3)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(3)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Speciality Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 163 [40 CFR 63.173(d)(4)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(4)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)(i)]
- 164 [40 CFR 63.173(d)(6)(i)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]
- 165 [40 CFR 63.173(d)(6)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each agitator as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.173(b)(1) and (d)(4), and the daily requirements of 40 CFR 63.173(d)(5). Subpart H. [40 CFR 63.173(g)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(1)]
- 166 [40 CFR 63.173(d)] Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(3)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(2)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within the first 12 months after initial startup or by no later than 12 months after the date of promulgation of a specific subpart that references 40 CFR 63 Subpart H, whichever is later, except as specified in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(2)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169. Subpart H. [40 CFR 63.174(c)(2)(i)]
- Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
- Which Months: All Year Statistical Basis: None Specified
 Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(1)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869.V3
 Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- 181 [40 CFR 63.174(l)(2)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]
- 182 [40 CFR 63.174(g)] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]
- 183 [40 CFR 63.174(h)(2)] Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2)]
- 184 [40 CFR 63.174(i)] Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]
- 185 [40 CFR 63.174(j)] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 186 [40 CFR 63.180] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.18 (a) through (k). Subpart H.
- 187 [40 CFR 63.182(c)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]
- 188 [40 CFR 63.182(d)] Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)]
- 189 [LAC 33.III.211] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- 190 [LAC 33.III.212] Comply with LAC 33.III.2121 by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63 Subpart H, HON. See Part 70 Specific Condition in Appendix A.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0001 110 - C-Unit Area Fugitive Emissions

- State Only - The number of each type of component required to be monitored for each monitoring period under applicable leak detection and repair programs shall be reported to the LDEQ by inclusion with each periodic monitoring report. Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification provided:
- a. Changes in components involve routine maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increase except from the fugitive emissions components themselves;
 - b. The changes do not involve any associated increases in production rate or capacity, or tie in of new or modified process equipment other than the piping components;
 - c. Actual emissions following the changes will not exceed the emission limits contained in this permit; and
 - d. The components are promptly incorporated into any applicable LDAR program.
- Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Compliance with the Louisiana Fugitive Emission Consolidation Program, with 40 CFR 63 Subpart H, HON, being the most stringent program, is determined as MACT.

FUG 0002 218 - C-Unit Wastewater Fugitive Emissions

- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Group 2 wastewater streams shall comply with the applicable recordkeeping and reporting requirements as specified in 40 CFR 63.146(b)(1) and 40 CFR 63.147(b)(8). [40 CFR 63.132(a)(3)]
 Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
 Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be compliance with 40 CFR 63 Subpart G, HON.

FUG 0004 227 - CaCl Unit Area Fugitive Emissions

- Emiss Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

FUG 0005 228 - CaCl Unit Wastewater Fugitive Emissions

SPECIFIC REQUIREMENTS

AID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0005 228 - CaCl Unit Wastewater Fugitive Emissions

- 199 [LAC 33:III.5107.A.2] 200 [LAC 33:III.5109.A.1]

Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be no additional controls.

FUG 0006 231 - 37% HCl Area Fugitive Emissions

- 201 [40 CFR 63.9000-9075] 202 [40 CFR 63.9000-9075]
 203 [40 CFR 63.9000(a)] 204 [40 CFR 63.9040(a)]
 205 [40 CFR 63.9055] 206 [LAC 33:III.5107.A.2]

Permittee shall comply with all the applicable requirements of 40 CFR 63, Subpart NNNNN - NESHAP for Hydrochloric Acid Production:40 CFR 63.1 thru 15, 63.9000 thru 63.9075.
 Permittee shall comply with all the applicable requirements as follows:
 1) Operate components as per 40 CFR 63.9000(a).
 2) Develop and implement a written startup, shutdown, and malfunction plan as per 40 CFR 63.1(e)(3).
 3) Submit Notification and Compliance Status as per 40 CFR 63.9045(e), and include the certification for LDAR plan.
 4) Submit reports as per 40 CFR 63.9040(c) and 40 CFR 63.9055(a), (c), (e), and (f)...
 Prepare and operate at all times according to an equipment LDAR plan that describes in detail the measure that will be put in place to detect leaks and repair them in a timely fashion. Submit the plan to DEQ for comment only with the Notification of Compliance Status. Subpart NNNNN. [40 CFR 63.9000(a)]
 Demonstrate continuous compliance with 40 CFR 63 Subpart NNNNN, Table 1 and Table 2, as applicable, according to 40 CFR 63 Subpart NNNNN. Table 4 and Table 5. Subpart NNNNN. [40 CFR 63.9040(a)]
 Permittee shall maintain records as per 40 CFR 63.9055(a) and (b) and 40 CFR 63.9060(a) thru (d). Subpart NNNNN VOC, Total recordkeeping by electronic or hard copy as needed. [40 CFR 63.9060(a) thru (d), 40 CFR 63.9055]
 Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 207 [40 CFR 60.Subpart VV] 208 [40 CFR 63.162(c)]
 209 [40 CFR 63.162(f)]

Comply with 40 CFR 60 Subpart VV by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63 Subpart H, HON. See Part 70 Specific Condition in Appendix A.
 Identify each piece of equipment in a process unit such that it can be distinguished readily from equipment that is not subject to 40 CFR 63 Subpart H. Subpart H. [40 CFR 63.162(c)]
 Clearly identify leaking equipment, for leaking equipment detected as specified in 40 CFR 63.163, 40 CFR 63.164, 40 CFR 63.168, 40 CFR 63.169, and 40 CFR 63.172 through 63.174. The identification may be removed after the equipment is repaired, except for valves or for connectors subject to 40 CFR 63.174(c)(1)(i). The identification on a valve may be removed after it has been monitored as specified in 40 CFR 63.168(f)(3) and 63.175(e)(i)(D), and no leak has been detected during the follow-up monitoring. If electing to comply using the provisions of 40 CFR 63.174(c)(1)(i), the identification on a connector may be removed after it is monitored as specified in 40 CFR 63.174(c)(1)(i) and no leak is detected during that monitoring. Subpart H. [40 CFR 63.162(f)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 210 [40 CFR 63.163(b)(1)] Pumps in light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, except as provided in 40 CFR 63.162(b) and 63.163(e) through (i). If a reading of 10,000 ppm (phase I); 5,000 ppm (phase II); or 5,000 ppm (phase III, pumps handling polymerizing monomers), 2,000 ppm (phase III, pumps in food/medical service), or 1,000 ppm (phase III, all other pumps) or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(1)]
- Which Months: All Year Statistical Basis: None Specified
- Pumps in light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquids dripping from the pump seal, a leak is detected. If a leak is detected, initiate the repair provisions specified in 40 CFR 63.163(c). Subpart H. [40 CFR 63.163(b)(3)]
- Which Months: All Year Statistical Basis: None Specified
- Pumps in light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.163(c)(3) and 40 CFR 63.171. Subpart H. [40 CFR 63.163(c)]
- Pumps in light liquid service: Implement a quality improvement program for pumps that complies with the requirements of 40 CFR 63.176, if in Phase III, calculated on a 6-month rolling average, the greater of either 10 percent of the pumps in a process unit or three pumps in a process unit leak. Subpart H. [40 CFR 63.163(d)(2)]
- Pumps in light liquid service: Determine percent leaking pumps using the equation in 40 CFR 63.163(d)(4). Subpart H. [40 CFR 63.163(d)(4)]
- Pumps in light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(1)]
- Pumps in light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid service. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(2)]
- Pumps in light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(3)]
- Pumps in light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the pump seal. If there are indications of liquid dripping from the pump seal at the time of the weekly inspection, monitor the pump as specified in 40 CFR 63.180(b) to determine if there is a leak of organic HAP in the barrier fluid. If an instrument reading of 1,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(4)]
- Which Months: All Year Statistical Basis: None Specified
- Pumps in light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)(i)]
- Pumps in light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(e)(6)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

Pumps in liquid service (dual mechanical seal system - sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the pump is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.163(e)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.163(e)(6). Comply with this requirement instead of the requirements in 40 CFR 63.163(a) through (d). Subpart H. [40 CFR 63.163(c)]

Which Months: All Year Statistical Basis: None specified
 Pumps in liquid service (unsafe-to-monitor): Determine that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.163(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(1)]

Pumps in liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.163(b) through (e). Subpart H. [40 CFR 63.163(j)(2)]

Which Months: All Year Statistical Basis: None specified
 Compressors: Equip with a seal system that includes a barrier fluid system and that prevents leakage of process fluid to the atmosphere, except as provided in 40 CFR 63.162(b) and 40 CFR 63.164(h) and (i). Subpart H. [40 CFR 63.164(a)]

Compressors: Operate the seal system with the barrier fluid at a pressure that is greater than the compressor stuffing box pressure; or equip with a barrier fluid system degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid directly into a process stream. Subpart H. [40 CFR 63.164(b)]

Compressors: Ensure that the barrier fluid is not in light liquid service. Subpart H. [40 CFR 63.164(c)]

Compressors: Equip each barrier fluid system as described in 40 CFR 63.164(a) through (c) with a sensor that will detect failure of the seal system, barrier fluid system, or both. Subpart H. [40 CFR 63.164(d)]

Compressors (sensor): Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. Subpart H. [40 CFR 63.164(e)(2)]

Compressors: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.164(g)]

Compressors (no detectable emissions): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually, and at other times requested by DEQ. Comply with this requirement instead of the requirements in 40 CFR 63.164(a) through (h). Subpart H. [40 CFR 63.164(i)(2)]

Which Months: All Year Statistical Basis: None specified
 Compressors (sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an alarm, unless the compressor is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criterion determined under 40 CFR 63.164(e)(2), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.164(g). Subpart H.

Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- Pressure relief device in gas/vapor service: Organic HAP < 500 ppm above background except during pressure releases, as determined by the method specified in 63.180(c). Subpart H. [40 CFR 63.165(a)]
 Which Months: All Year Statistical Basis: None specified
- Pressure relief devices in gas/vapor service: After each pressure release, return to a condition indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.165(b)(1)]
- Pressure relief devices in gas/vapor service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) after the pressure release and being returned to organic HAP service, to confirm the condition indicated by an instrument reading of less than 500 ppm above background, as measured by the method specified in 40 CFR 63.180(c). Subpart H. [40 CFR 63.165(b)(2)]
- Pressure relief devices in gas/vapor service (rupture disk): After each pressure release, install a new rupture disk upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.165(a) and (b). Subpart H. [40 CFR 63.165(d)(2)]
- Sampling connection systems: Equip with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 63.162(b). Operate the system as specified in 40 CFR 63.166(b). Subpart H.
- Open-ended valves or lines: Equip with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 63.162(b) and 40 CFR 63.167(d) and (e). Ensure that the cap, blind flange, plug or second valve seals the open end at all times except during operations requiring process fluid flow through the open-ended valve or line, or during maintenance or repair. Operate each open-ended valve or line equipped with a second valve in a manner such that the valve on the process fluid end is closed before the second valve is closed. Subpart H.
- Valves in gas/vapor service or light liquid service (Phase I): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase II): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Subpart H. [40 CFR 63.168(c)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (Phase III, 2 percent or greater leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly, as specified in 40 CFR 63.180(b); or implement a quality improvement program for valves that complies with the requirements of 40 CFR 63.175 and monitor quarterly. If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). If electing to implement a quality improvement program, follow the procedures in 40 CFR 63.175. Subpart H. [40 CFR 63.168(d)(1)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialtity Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

FUG 0007_232 - ECH Finishing Section Fugitive Emissions

- Valves in gas/vapor service or light liquid service (Phase III, less than 2 percent leaking valves): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 quarterly, as specified in 40 CFR 63.180(b). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.168(f). Permittee may elect to comply with the alternate standards in 40 CFR 63.168(d)(3) and (c)(4). Subpart H. [40 CFR 63.168(d)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Determine percent leaking valves using the equation in 40 CFR 63.168(e)(1). Subpart H. [40 CFR 63.168(e)(1)]
- Valves in gas/vapor service or light liquid service (after leak repair): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within three months (at least) after repair to determine whether the valve has resumed leaking. Subpart H. [40 CFR 63.168(e)(3)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after a leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.168(f)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.168(b) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(1)]
- Valves in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the valves as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (f). Subpart H. [40 CFR 63.168(h)(2)]
- Which Months: All Year Statistical Basis: None specified
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(1)]
- Valves in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the valves at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.168(b) through (d). Subpart H. [40 CFR 63.168(i)(3)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 within 5 days (calendar) if evidence of a potential leak to the atmosphere is found by visible, audible, olfactory, or any other detection method. If a reading of 10,000 ppm for agitators, 5,000 ppm for pumps handling polymerizing monomers, 2,000 ppm for all other pumps (including pumps in food/medical service), or 500 ppm for valves, connectors, instrumentation systems, and pressure relief devices, or greater is recorded. If a leak is detected, initiate repair provisions specified in 40 CFR 63.169(c). Subpart H. [40 CFR 63.169(a)]
- Which Months: All Year Statistical Basis: None specified
- Pumps, valves, connectors, and agitators in heavy liquid service; instrumentation systems; and pressure relief devices in liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.169(c)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 251 [40 CFR 63.172(0)(1)(i)] Closed-vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(i)]
 Which Months: All Year Statistical Basis: None specified
- 252 [40 CFR 63.172(0)(1)(iii)] Closed-vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(1)(ii)]
 Which Months: All Year Statistical Basis: None specified
- 253 [40 CFR 63.172(0)(2)(i)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(i)]
 Which Months: All Year Statistical Basis: None specified
- 254 [40 CFR 63.172(0)(2)(ii)] Closed-vent system (duct work): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.180(b). If an instrument reading greater than 500 ppm above background is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.172(h). Subpart H. [40 CFR 63.172(f)(2)(ii)]
 Which Months: All Year Statistical Basis: None specified
 Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.172(i). Subpart H. [40 CFR 63.172(h)]
- 255 [40 CFR 63.172(h)] Closed-vent system (bypass lines): Flow monitored by flow indicator once every 15 minutes. Install flow indicator at the entrance to any bypass line. Subpart H. [40 CFR 63.172(j)(1)]
 Which Months: All Year Statistical Basis: None specified
- 256 [40 CFR 63.172(j)(1)] Closed-vent system (bypass lines): Flow recordkeeping by electronic or hard copy once every 15 minutes. Generate records as specified in 40 CFR 63.118(a)(3). Subpart H. [40 CFR 63.172(j)(1)]
- 257 [40 CFR 63.172(j)(1)] Closed-vent system (unsafe-to-inspect): Demonstrate that the equipment is unsafe to inspect because inspecting personnel would be exposed to an imminent or potential dangers as a consequence of complying with 40 CFR 63.172(f)(1) or (f)(2). Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]
- 258 [40 CFR 63.172(k)(1)] Closed-vent system (unsafe-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires inspection of the equipment as frequently as practicable during safe-to-inspect times, but not more frequently than annually. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(2)]
 Which Months: All Year Statistical Basis: None specified
- 259 [40 CFR 63.172(k)(2)] Closed-vent system (difficult-to-inspect): Demonstrate that the equipment cannot be inspected without elevating the inspecting personnel more than 2 meters above a support surface. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(k)(1)]
- 260 [40 CFR 63.172(l)(1)] Closed-vent system (difficult-to-inspect): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every five years. Maintain a written plan that requires inspection of the equipment at least once every five years. Comply with this requirement instead of the requirements in 40 CFR 63.172(f)(1) and (f)(2). Subpart H. [40 CFR 63.172(l)(2)]
 Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 262 [40 CFR 63.172(m)] Ensure that the closed-vent system or control device is operating whenever organic HAP emissions are vented to the closed-vent system or control device. Subpart H. [40 CFR 63.172(m)]
- 263 [40 CFR 63.173(a)] Agitators in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 monthly to detect leaks, as specified in 40 CFR 63.180(b). If an instrument reading of 10,000 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(a)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service: Presence of a leak monitored by visual inspection/determination weekly (calendar) for indications of liquids dripping from the agitator. If there are indications of liquids dripping from the agitator, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.173(c). Subpart H. [40 CFR 63.173(b)]
- 264 [40 CFR 63.173(b)] Agitators in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171. Subpart H. [40 CFR 63.173(b)]
- 265 [40 CFR 63.173(c)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Operate with the barrier fluid at a pressure that is at all times greater than the agitator stuffing box pressure; or equip with a barrier fluid degassing reservoir that is routed to a process or fuel gas system or connected by a closed-vent system to a control device that complies with the requirements of 40 CFR 63.172; or equip with a closed-loop system that purges the barrier fluid into a process stream. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(1)]
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Ensure that the barrier fluid is not in light liquid organic HAP service. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(2)]
- 266 [40 CFR 63.173(d)(1)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Equip barrier fluid system with a sensor that will detect failure of the seal system, barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(3)]
- Agitators in gas/vapor service or light liquid service (dual mechanical seal system): Presence of a leak monitored by visual inspection/determination weekly (calendar). Monitor for indications of liquids dripping from the agitator seal. If there are indications of liquid dripping from the agitator seal at the time of the weekly inspection, monitor the agitator as specified in 40 CFR 63.180(b) to determine the presence of organic HAP in the barrier fluid. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate the repair provisions in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(4)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Determine, based on design considerations and operating experience, criteria that indicates failure of the seal system, the barrier fluid system, or both. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)(i)]
- 267 [40 CFR 63.173(d)(2)]
- 268 [40 CFR 63.173(d)(3)]
- 269 [40 CFR 63.173(d)(4)]
- 270 [40 CFR 63.173(d)(6)(i)]
- 271 [40 CFR 63.173(d)(6)] Agitators in gas/vapor service and light liquid service (dual mechanical seal system): Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 63.171. Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)(6)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 272 [40 CFR 63.173(d)] Agitators in gas/vapor service or light liquid service (dual mechanical seal system sensor): Equipment/operational data monitored by visual inspection/determination daily, or equip with an audible alarm unless the agitator is located within the boundary of an unmanned plant site. If the sensor indicates failure of the seal system, the barrier fluid system, or both based on the criteria established in 40 CFR 63.173(d)(6), a leak is detected. If a leak is detected, initiate repair provisions specified in 40 CFR 63.173(d)(6). Comply with this requirement instead of the requirements in 40 CFR 63.173(a). Subpart H. [40 CFR 63.173(d)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unmanned plant site): Presence of a leak monitored by visual inspection/determination at the regulation's specified frequency. Monitor each agitator as often as practicable and at least monthly. Comply with this requirement instead of the weekly visual inspection requirement of 40 CFR 63.173(b)(1) and (d)(4), and the daily requirements of 40 CFR 63.173(d)(5). Subpart H. [40 CFR 63.173(g)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Demonstrate that the agitator cannot be monitored without elevating the monitoring personnel more than two meters above a support surface or it is not accessible at anytime in a safe manner. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(1)]
- Agitators in gas/vapor service or light liquid service (difficult-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Maintain a written plan that requires monitoring of the agitator at least once per calendar year. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(h)(3)]
- Which Months: All Year Statistical Basis: None specified
- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the agitator is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.173(a) through (d). Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(1)]
- Agitators in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of the agitator as frequently as practicable during safe-to-monitor times, but not more frequently than the periodic monitoring schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.173(a) through (d). Subpart H. [40 CFR 63.173(j)(2)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service: Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once within 12 months after the compliance date, except as provided in 40 CFR 63.174(f) through (h). If an instrument reading of 500 ppm or greater is recorded, a leak is detected. If a leak is detected, initiate repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(b)(1)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service (0.5% or greater leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually. Subpart H. [40 CFR 63.174(b)(3)(i)]
- Which Months: All Year Statistical Basis: None specified
- Connectors in gas/vapor service or light liquid service (less than 0.5% leaking): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once every two years. Subpart H. [40 CFR 63.174(b)(3)(ii)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AJ ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- 281 [40 CFR 63.174(c)(1)(i)] Connectors in gas/vapor service or light liquid service (opened or otherwise had the seal broken): Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 within three months after being returned to organic HAP service or when it is reconnected. If monitoring detects a leak, repair according to the provisions of 40 CFR 63.174(d), as specified, except as provided in 40 CFR 63.174(c)(1)(ii). Subpart H. [40 CFR 63.174(c)(1)(i)]
- 282 [40 CFR 63.174(c)(2)(i)] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Comply with the requirements of 40 CFR 63.169. Subpart H. [40 CFR 63.174(c)(2)(i)]
- 283 [40 CFR 63.174(c)(2)(ii)] Connectors in gas/vapor service or light liquid service (2 inches or less in nominal diameter): Organic HAP monitored by technically sound method within three months after being returned to organic HAP service after having been opened or otherwise had the seal broken. If monitoring detects a leak, implement repair provisions in 40 CFR 63.174(d). Subpart H. [40 CFR 63.174(c)(2)(ii)]
- 284 [40 CFR 63.174(d)] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service: Make a first attempt at repair no later than 5 calendar days after each leak is detected, and complete repairs no later than 15 calendar days after it each leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Subpart H. [40 CFR 63.174(d)]
- 285 [40 CFR 63.174(f)(1)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Demonstrate that the connector is unsafe to monitor because personnel would be exposed to an immediate danger as a result of complying with 40 CFR 63.174(a) through (c). Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(1)]
- 286 [40 CFR 63.174(f)(2)] Connectors in gas/vapor service or light liquid service (unsafe-to-monitor): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 at the regulation's specified frequency. Maintain a written plan that requires monitoring of connectors as frequently as practicable during safe to monitor times, but not more frequently than the periodic schedule otherwise applicable. Comply with this requirement instead of the requirements in 40 CFR 63.174(a). Subpart H. [40 CFR 63.174(f)(2)]
- 287 [40 CFR 63.174(g)] Which Months: All Year Statistical Basis: None specified Connectors in gas/vapor service or light liquid service (unsafe-to-repair): Demonstrate that repair personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 63.174(d). Comply with this requirement instead of the requirements in 40 CFR 63.174(a), (d), and (e). Subpart H. [40 CFR 63.174(g)]
- 288 [40 CFR 63.174(h)(2)] Connectors in gas/vapor service or light liquid service (inaccessible, ceramic, or ceramic-lined): Make a first attempt at repair within 5 days after leak is detected by visual, audible, olfactory or other means, and complete repairs no later than 15 calendar days after leak is detected, except as provided in 40 CFR 63.171 and 63.174(g). Comply with this requirement instead of the monitoring requirements of 40 CFR 63.174(a) and (c) and from the recordkeeping and reporting requirements of 40 CFR 63.181 and 63.182. Subpart H. [40 CFR 63.174(h)(2)]
- 289 [40 CFR 63.174(i)] Connectors in gas/vapor service or light liquid service: Calculate percent leaking connectors as specified in 40 CFR 63.174(i)(1) and (i)(2). Subpart H. [40 CFR 63.174(i)]
- 290 [40 CFR 63.180] Comply with the test methods and procedures requirements provided in 40 CFR 63.180. Subpart H.
- 291 [40 CFR 63.181] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 63.181 (a) through (k). Subpart H.
- 292 [40 CFR 63.182(c)] Submit Notification of Compliance Status: Due within 90 days of the compliance dates specified in the 40 CFR 63 subpart that references 40 CFR 63 Subpart H. Include the information specified in 40 CFR 63.182(c)(1) through (c)(3). Subpart H. [40 CFR 63.182(c)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

FUG 0007 232 - ECH Finishing Section Fugitive Emissions

- Submit Periodic Reports: Due semiannually starting 6 months after the Notification of Compliance Status, as required in 40 CFR 63.182(c). Include the information specified in 40 CFR 63.182(d)(2) through (d)(4). Subpart H. [40 CFR 63.182(d)] Equip all rotary pumps and compressors handling volatile organic compounds having a true vapor pressure of 1.5 psia or greater at handling conditions with mechanical seals or other equivalent equipment.
- Comply with LAC 33.III.2121 by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63 Subpart H, HON. See Part 70 Specific Condition in Appendix A.
- State Only - The number of each type of component required to be monitored for each monitoring period under applicable leak detection and repair programs shall be reported to the LDEQ by inclusion with each periodic monitoring report. Fugitive emission piping components may be added to or removed from the permitted units, without triggering the need to apply for a permit modification provided:
- a. Changes in components involve routine maintenance or are undertaken to address safety concerns, or involve small piping revisions with no associated emissions increase except from the fugitive emissions components themselves;
 - b. The changes do not involve any associated increases in production rate or capacity, or tie in of new or modified process equipment other than the piping components;
 - c. Actual emissions following the changes will not exceed the emission limits contained in this permit; and
 - d. The components are promptly incorporated into any applicable LDAR program.
- Include emissions of all toxic air pollutants listed in LAC 33.III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33.III.5105.B.
- Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Compliance with the Louisiana Fugitive Emission Consolidation Program, with 40 CFR 63 Subpart H, HON, being the most stringent program, is determined as MACT.
- GRP 0006 104 - CI Absorber Vents Cap**
- Group Members:** EQT 0008 EQT 0009
- Emissions of Chlorine <= 2.39 tons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, if the total calculated Chlorine emissions exceeds the maximum listed in this specific condition for any twelve consecutive month period.
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total calculated chlorine emissions each month, as well as the total calculated chlorine emissions for the last twelve months. Make records available for inspection by DEQ personnel.
- Submit report: Due annually, by the 31st of March. Report the total calculated chlorine emissions for the preceding calendar year to the Office of Environmental Compliance. This report can be combined with reports required under LAC 33.III.535.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

GRP 0007 229 - HCI Loading Cap

Group Members: EQT 0023EQT 0024

- 302 [LAC 33:II.501.C.6] HCI Loading Throughput <= 48.4 MM gallons/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, if total HCI loading throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.
 Which Months: All Year Statistical Basis: None specified
 Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total HCI loading throughout each month, as well as the total HCI loading throughout for the last twelve months. Make records available for inspection by DEQ personnel.
 Submit report: Due annually, by the 31st of March. Report the total HCI loading throughout for the preceding calendar year to the Office of Environmental Compliance. This report can be combined with reports required under LAC 33:III.535.
- 303 [LAC 33:II.507.H.1.a]
 304 [LAC 33:II.507.H.1.a]

305 [LAC 33:II.501.C.6]

The Organic Chloride Incinerators, Emission Point Nos. 173 and 174, are used as control devices for emission sources in this permit. See the Hazardous Waste Incinerators Permit, Permit No. 2252-V2, for more information on the incinerators.

CRG 0005 HON Tanks - HON Tank Requirements Without 2103 Applicability

Group Members: EQT 0045EQT 0046EQT 0047EQT 0085EQT 0086

- 306 [40 CFR 63.119(a)(1)] Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
 Operate and maintain a closed-vent system and control device meeting the requirements specified in 40 CFR 63.119(e), route the emissions to a process or a fuel gas system as specified in 40 CFR 63.119(f), vapor balance as specified in 40 CFR 63.119(g), or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(2)]
 Submit an Initial Notification as required by 40 CFR 63.151(b). Subpart G. [40 CFR 63.122(a)(1)]
 Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
 Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- 307 [40 CFR 63.119(a)(2)]
 308 [40 CFR 63.122(a)(1)]
 309 [40 CFR 63.122(a)(3)]
 310 [40 CFR 63.122(a)(4)]

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
 Activity Number: PER20080003
 Permit Number: 2869-V3
 Air - Title V Regular Permit Renewal

CRG 0005 HON Tanks - HON Tank Requirements Without 2103 Applicability

- 311 [40 CFR 63.122(a)(5)] Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- 312 [40 CFR 63.123] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.

UNF 0003 Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

- 313 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 314 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. [40 CFR 61.145(b)(1)]
- 315 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 316 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 317 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 318 [40 CFR 61.357(b)] Submit report: Due whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3).
- 319 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 320 [40 CFR 63.112(a)] Control emissions of organic HAPs to the level represented by the equation listed in 40 CFR 63.112(a). Subpart G. [40 CFR 63.112(a)]
- 321 [40 CFR 63.112(c)] Demonstrate compliance with the emission standard in 40 CFR 63.112(a) by following the procedures specified in 40 CFR 63.112(e) for all the emission points, or by following the emissions averaging compliance approach specified in 40 CFR 63.112(f) for some emission points and the procedures specified in 40 CFR 63.112(e) for all other emission points within the source. Subpart G. [40 CFR 63.112(c)]
- 322 [40 CFR 63.151(b)] Submit Initial Notification: Due in writing within 120 calendar days after the date of promulgation of 40 CFR 63 Subpart G. Include the information specified in 40 CFR 63.151(b)(1)(i) through (b)(1)(v). Subpart G. [40 CFR 63.151(b)]
- 323 [40 CFR 63.152(c)] Submit Periodic Reports: Due semiannually no later than 60 calendar days after the end of each 6-month period, except as specified in 40 CFR 63.152(c)(5) and (c)(6). Submit the first report no later than 8 months after the date the Notification of Compliance Status is due. Include the information specified in 40 CFR 63.152(c)(2) through (c)(4). Subpart G. [40 CFR 63.152(c)]
- 324 [40 CFR 63.152(f)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records as specified in 40 CFR 63.152(f)(1) through (f)(7). Subpart G. [40 CFR 63.152(f)]
- 325 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 3 of 40 CFR 63 Subpart F.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Speciality Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal!

UNF 0003 Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

- 326 [40 CFR 68.12(b)(1)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 68.22. [40 CFR 68.12(b)(1)]
- 327 [40 CFR 68.12(b)(2)] Complete the five-year accident history for the process as provided in 68.42. [40 CFR 68.12(b)(2)]
- 328 [40 CFR 68.12(b)(3)] Ensure that response actions have been coordinated with local emergency planning and response agencies. [40 CFR 68.12(b)(3)]
- 329 [40 CFR 68.12(b)(4)] Include in the RMP the certification specified in 68.12(b)(4). [40 CFR 68.12(b)(4)]
- 330 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 331 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 332 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).
- 333 [40 CFR 68.165] Submit in the RMP information one worst-case release scenario for each Program I process. Include the data specified in 68.165(b)(1) through (13).
- 334 [40 CFR 68.168] Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).
- 335 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 336 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 337 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 338 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 339 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 340 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 341 [40 CFR 68.28] Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
- 342 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 343 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 344 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 345 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

UNF 0003 Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

- 346 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (c) on the offsite consequence analyses.
- Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 348 [40 CFR 82. Subpart F] Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
- Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.1.11 or intensify an existing traffic hazard condition are prohibited.
- Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-f.
- Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51 .Subchapter A.
- Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexlon Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

UNF 0003 Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

- 361 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 362 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931.
- 363 [LAC 33:III.5107.B.4] Submit notification in the manner provided in LAC 33:III.3923.
- 364 [LAC 33:III.5107.B.5] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures, or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 365 [LAC 33:III.5109.C] Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 366 [LAC 33:III.5113.A.1] Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 367 [LAC 33:III.5113.A.2] An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 368 [LAC 33:III.5151.F.1.] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 369 [LAC 33:III.535] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 370 [LAC 33:III.5609.A.1.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 371 [LAC 33:III.5609.A.2.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 372 [LAC 33:III.5609.A.3.b] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 373 [LAC 33:III.5609.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.

SPECIFIC REQUIREMENTS

AI ID: 87883 - Hexion Specialty Chemicals Inc
Activity Number: PER20080003
Permit Number: 2869-V3
Air - Title V Regular Permit Renewal

UNF 0003 Norco Facility - C-Unit, CaCl Unit, and ECH Finishing System

374 [LAC 33:II.5901.A]

Comply with the provisions in 40 CFR 68, except as specified in LAC 33:II.5901.

Identity hazards that may result from accidental releases of the substances listed in 40 CFR 68.1:30, Table 59.0 of LAC 33:II.5907, or Table 59.1 of LAC 33:II.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.

Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:II. Chapter 59, whichever is later. Include the information listed in LAC 33:II.5911.B, and submit to the Office of Environmental Compliance.

Submit amended registration: Due to the Office of Environmental Compliance within 60 days after the information in the submitted registration is no longer accurate.

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Compliance. Include all data applicable to the emissions source(s), as specified in LAC 33:II.919.A-D.

375 [LAC 33:II.5907]

376 [LAC 33:II.5911.A]

377 [LAC 33:II.5911.C]

378 [LAC 33:II.919.D]

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

APPENDIX A
PART 70 SPECIFIC CONDITIONS
C-UNIT, CACL₂ UNIT, AND ECH FINISHING SYSTEM
NORCO FACILITY
AGENCY INTEREST NO.: 87883
HEXION SPECIALTY CHEMICALS, INC.
NORCO, ST. CHARLES PARISH, LOUISIANA

Permittee shall comply with a streamlined equipment leaks monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the applicable fugitive emission monitoring programs being streamlined, as indicated in the following table. Noncompliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- a. Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamlined program will include any exemptions based on size of component available in any of the programs being streamlined.
- b. Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- c. Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on September 30 and March 31, to cover the periods January 1 through June 30 and July 1 through December 31, respectively. The semiannual reports shall include any monitoring performed within the reporting period.

Unit or Plant Site	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
FUG 1 110 C-Unit Area Fugitives	40 CFR 63 Subpart H – HON 40 CFR 60 Subpart VV	5% VOHAP 10% VOC	40 CFR 63 Subpart H – HON
FUG 7 232 ECH Finishing Section Fugitives	LAC 33:III.2121	10% VOC	